

1
2
3
4
5
6
7
8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**
10

11 MATTHEW PETERSON, *et al.*,

12 Plaintiffs,

13 v.

14 THOMSON INTERNATIONAL,
15 INCORPORATED,

16 Defendant.
17

Case No.: 1:22-cv-00701-JLT-CDB

PRETRIAL ORDER

Deadlines:

Motions in Limine Filing: **December 20, 2024**
Oppositions to Motions in Limine: **January 3, 2025**
Trial Submissions: **January 15, 2025**

Jury trial: January 22, 2025, at 8:30 a.m., 20 days
estimate

18 On October 7, 2024, the Court conducted a final pretrial conference. Lindsay C. Lien Amin
19 appeared as counsel for Plaintiffs; Robert Sallander, Robert Seeds and Helen Chen appeared as
20 counsel for Defendant.

21 This case concerns the 2020 North American Salmonella Newport outbreak, associated with
22 Thomson International Incorporated's onions grown in the central and southern valleys of California.
23 (*See* Compl., Doc. 1 at ¶ 23.) Plaintiffs are seven individuals who contracted Salmonella infections
24 after consuming onions allegedly “produced and sourced by Defendant Thomson International[.]” (*Id.*
25 at 7–12.)¹ Plaintiffs bring four causes of action against Defendant: (1) strict liability; (2) breach of
26 express and implied warranties; (3) negligence; and (4) negligence per se. (*Id.* at 12–16.) Plaintiffs
27

28 ¹ On July 15, 2024, the Court granted Defendants' Motion to Dismiss Plaintiff Carson Brenda from the
instant action. (Doc. 76.)

request economic and non-economic damages, as well as medical expenses. (*Id.* at 16–17.) Plaintiffs also request pre-judgment and post-judgment interest. (*Id.* at 17.)

A. JURISDICTION/ VENUE

This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1332 based on diversity jurisdiction. In addition, Defendant resides in Bakersfield, California. (Doc. 1 at ¶ 9.) Accordingly, venue is proper in the United States District Court for the Eastern District of California. *See* 28 U.S.C. § 1391(b)(1).

B. JURY TRIAL

The parties demanded a jury trial in this matter. (Doc. 1 at 17; Doc. 82 at 2.) The jury trial will consist of eight jurors.

C. UNDISPUTED FACTS

The parties have provided a statement of undisputed facts, recited below. (Doc. 82 at 2–7.)

1. Thomson grew and sold onions in 2020 (“Thomson onions”).
2. The Thomson onions were grown in various fields in Holtville and Bakersfield, California.
3. *Salmonella enterica* serotype Newport is a bacteria that causes illness in humans.
4. *Salmonella* (via human or animal fecal material) can contaminate many types of foods.
5. Onions contaminated with *Salmonella* Newport are harmful when consumed by humans.
6. Produce containing *Salmonella* is considered adulterated under the Food, Drug and Cosmetic Act.
7. Symptoms of *Salmonella* typically occur within six hours to six days following ingestion, and commonly consist of diarrhea, nausea, vomiting, fever, and abdominal cramping, but can be more severe.
8. *Salmonella* is a reportable disease.
9. FDA traceback efforts focused on restaurant clusters.
10. CDC Cluster Code “2007MLJJP-1” refers to an outbreak of *Salmonella* Newport.
11. The total number of US cases associated with the cluster was 1,127.

- 1 12. Inspections of Thomson facilities were conducted in August and September 2020.
- 2 13. Some Thomson onions were packed in the field.
- 3 14. Thomson shipped Thomson onions to Sysco Montana.
- 4 15. Sadie Floding² became ill with Salmonella.
- 5 16. Lynnetta Klam became ill with Salmonella.
- 6 17. Teisha Benson became ill with Salmonella.
- 7 18. Jody Barry became ill with Salmonella.
- 8 19. Lori Davies became ill with Salmonella.
- 9 20. Matthew Peterson became ill with Salmonella.
- 10 21. Colin Strub became ill with Salmonella.
- 11 22. This case arises from the same 2020 Salmonella Newport outbreak that was the subject
- 12 of plaintiffs' claims in *Angelo v. Thomson International Inc.*, case no. 1:21-CV-01609-
- 13 JLT-CDB. Judgment in *Angelo* was entered in favor of Thomson on July 19, 2024.
- 14 23. Thomson is a family-owned business that has been farming in Bakersfield since 1893. It
- 15 has grown onions, and other crops, in Bakersfield and Holtville, California.
- 16 24. In 2020, Thomson had about 300 acres of onions in cultivation.
- 17 25. As in prior years, Thomson had a food safety program in place that was audited by
- 18 Primus, a leading independent third-party auditor.
- 19 26. Approximately 80 percent of Thomson's 2020 onion crop, which included yellow, sweet
- 20 yellow, red, and white onion varieties, were brokered by Onions 52, a Utah-based onion
- 21 grower, packer, and seller, and KOR Produce, a Pennsylvania-based broker.
- 22 27. At the time, Onions 52 was brokering for five other onion growers and receiving their
- 23 onions into the same facilities where it handled Thomson's onions.
- 24 28. On July 10, 2020, the U.S. Centers for Disease Control and Prevention ("CDC")
- 25 identified an outbreak of Salmonella Newport infections, but had not identified a specific
- 26
- 27
- 28

² Sadie Floding now uses the name Sadie Merkel. (Doc. 82 at 11.)

1 food, grocery store, or restaurant as the source of the outbreak. The outbreak was
2 assigned the identity, CDC cluster code 2007MLJJP-1. By then, the outbreak had
3 peaked.

4 29. The FDA contacted Thomson as part of its investigation.

5 30. The FDA investigation of Thomson's farms and packing houses took place from August
6 3 to approximately September 18, 2020. As part of its ongoing investigation, the FDA,
7 with the assistance of the California Department of Public Health, sent a team of
8 inspectors to Thomson's packing facility and growing fields.

9 31. They gathered nearly 2,000 samples for laboratory testing.

10 32. The inspection teams spent approximately 150 hours examining and taking
11 environmental samples.

12 33. The inspectors did not take water samples from the canal used to irrigate Thomson's field
13 in Holtville. The canal was dry at the time of inspection. Water samples were from more
14 distant canals.

15 34. Because of COVID, the inspectors required the packing house to be fully opened and for
16 there to be no personnel present. Packing operations and customary maintenance and
17 cleaning of the packing house were suspended.

18 35. The outbreak strain of *Salmonella* Newport has not been isolated in any TII onion, any
19 product made with TII onions, in TII's packing facility, on its equipment, or at TII's
20 growing fields.

21 36. No TII onion has tested positive for the outbreak strain of *Salmonella* Newport.

22 37. The FDA stated that "the *Salmonella* Newport outbreak strain (specific whole genome
23 sequence [WGS]) was not identified in any of the nearly 2,000 subsamples tested."

24 38. The FDA stated that "a conclusive root cause of the outbreak could not be identified."

25 39. The FDA failed to follow up where the case exposure was at Subway retail units (not
26 supplied by Thomson), where the FDA could not explain the exposures.

27 40. The FDA conducted no sampling or environmental inspection of Onions 52, Hartley
28

1 Produce, or other farms that supplied them onions.

2 41. WGS is the subtyping of bacterial isolate that is submitted by culture-positive ill
3 persons, and is performed within the PulseNet molecular laboratory surveillance
4 system headed by the CDC.

5 42. WGS is performed by sequencing the DNA or “genomic makeup” of each Salmonella
6 isolate. Genomes from culture-positive patients, food, and environmental isolates are
7 compared through sequencing to determine whether they are genetically similar.

8 43. The first step in epidemiological investigations is to contact caregivers or case
9 patients with the outbreak strain without delay in order to gather information about
10 food and beverages consumed in the several days before the case patient fell ill.

11 44. In the 2020 Salmonella Newport outbreak, early case patient interviews indicated
12 Mexican-style foods, with several subclusters associated with Mexican-style
13 restaurants identified, prompting supplementary interviews and questionnaires
14 focusing on Mexican-style food and food ingredients.

15 45. Other exposures assessed were white and yellow onions, red, round tomatoes,
16 Roma tomatoes, green peppers, hot peppers, cilantro, and ground beef, which
17 were identified in 3, 4, 4, 2, 4, 3, 6, and 5 subclusters, respectively.

18 46. Most of Thomson’s customers were wholesalers that place orders with TII by email or
19 telephone. Thomson did not sell its onions directly to retailers outside of Southern
20 California.

21 47. Thomson did not deliver or ship the vast majority of its produce to customers.

22 48. Purchasers made their own arrangements to pick up and transport produce from
23 Thomson’s Bakersfield, CA facility.

24 49. Thomson provided its produce to these purchasers FOB.

25 50. Though unnecessary for Thomson’s purposes, customers may have sometimes listed a
26 “ship to” address on purchase orders.

27 51. Thomson keeps records of any “ship to” addresses provided by its customers.
28

1 52. Neither HelloFresh nor EveryPlate was a TII customer in 2020.

2 53. TII did not arrange transportation for shipment of TII product to HelloFresh or
3 EveryPlate in 2020.

4 54. EveryPlate did not purchase onions from Thomson.

5 55. EveryPlate had 32 suppliers of onions for its meal kit products in 2020, none of which
6 was Thomson.

7 56. None of EveryPlate's suppliers for meal kits in 2020 was HelloFresh.

8 57. EveryPlate submitted purchase orders to its suppliers for a given week.

9 58. The onions were shipped by the suppliers to EveryPlate's various distribution centers.

10 59. Subway was not a TII customer in 2020.

11 60. Thomson did not ship onions to Great Wolf Lodge in Washington where plaintiff
12 Mathew Peterson allegedly ate a sandwich with onions.

13 61. Thomson did not ship onions to Jimmy John's in Helena, Montana where plaintiff Sadie
14 Floding allegedly ate a sandwich with onion rings.

15 62. Thomson did not ship onions to Bert & Ernie's in Helena, Montana where plaintiff Sadie
16 Floding allegedly ate a sandwich with red onions.

17 63. Thomson did not ship onions to Amazon from which plaintiff Colin Strub allegedly
18 bought a red onion. Amazon was not a TII distributor.

19 64. Thomson did not ship onions to Bajio Mexican restaurant in Portland, Oregon where
20 plaintiff Jody Barry allegedly ate street tacos with white or yellow onions.

21 65. Thomson did not ship onions to MOD Pizza in Gresham, Oregon where plaintiff Jody
22 Barry allegedly ate a pizza with cooked onions.

23 66. Thomson did not ship onions to La Tienda De Guadalupe in Gresham, Oregon where
24 plaintiff Jody Barry allegedly ate salsa containing onions.

25 67. Thomson did not ship onions to KFC in Great Falls, Montana where plaintiff Teisha
26 Benson allegedly ate a King Burger with onions.

27 68. Thomson did not ship onions to IGA in Great Falls, Montana where plaintiff Teisha
28

Benson allegedly bought red onions.

69. There is no evidence showing where the church members from plaintiff Teischa Benson's church purchased the onions served at a potluck.

70. Thomson did not ship onions to Sobeys in Calgary, Alberta, Canada where plaintiff Lynnetta Klam's daughter allegedly bought toppings for a home-made pizza.

71. Properly cooking onions kills any Salmonella so that a person consuming it would not become ill.

72. Thomson did not ship onions to Fat Bass in Priest River, Idaho where plaintiff Lori Davies allegedly ate a hamburger with onions.

73. Thomson did not ship onions to Dish in Priest River, Idaho where plaintiff Lori Davies allegedly ate a fish taco with onions.

74. Thomson did not ship onions to Blu Olive in Portland, Oregon where plaintiff Lori Davies allegedly ate a salad with red onions.

D. DISPUTED FACTS

The parties have provided the following list of facts in dispute.

1. Thomson's personnel were trained in food safety.
2. Michelson Laboratories, Inc. tested Thomson's irrigation water annually during the growing season and did not detect Salmonella.
3. Onions 52 took physical possession of approximately 20 percent—as many as four million pounds—of the onions it sold from Thomson and repacked them before distribution to others.
4. On July 13, 2020, PulseNet notified FDA of a cluster of 134 Salmonella Newport illnesses from 16 states. By this time TII had not shipped onions to nine of the listed states.
5. As of July 20, 2020, the only food items consumed by outbreak cases that were significant when compared to the Food Net Population Survey were cilantro and leafy greens.

- 1 6. On July 20, 2020, the notable exposures from SEDRIC did not include onions and were
- 2 leafy greens, cheese, beef, chicken, tomatoes, and cilantro.
- 3 7. As of July 21, 2020, microbiological and epidemiological information were unable to
- 4 identify a single suspect vehicle.
- 5 8. Information from points of service did not indicate if Thomson onions were the onions
- 6 that were consumed by the cases.
- 7 9. No outbreak clusters were in Southern California.
- 8 10. The amount in controversy and the cause of plaintiffs' illnesses and damages.
- 9 11. Thomson introduced Salmonella contaminated onions into the stream of commerce,
- 10 regardless of where the onions were initially picked up.
- 11 12. Thomson's annual sales were approximately \$10 million.
- 12 13. Thomson onions were shipped via other entities to the lower 48 states and several
- 13 Canadian provinces.
- 14 14. Salmonella infections can be associated with several long-term sequelae, such as post-
- 15 infectious bowel changes.
- 16 15. When a human tests positive for Salmonella, the health care provider is required to
- 17 submit the sick person's Salmonella isolate for analysis by public health officials.
- 18 16. Public health entities at the state level may perform testing called whole genome
- 19 sequencing on Salmonella isolates.
- 20 17. In June 2020, public health officials noticed an increase in closely related human
- 21 Salmonella Newport cases ("the outbreak strain").
- 22 18. Some individuals with the outbreak strain were interviewed by public health workers to
- 23 determine their possible exposures.
- 24 19. As data was amassed, both Canadian and U.S. investigations independently began to
- 25 show a significant correlation between infection with the outbreak strain and
- 26 consumption of foods containing bulb onion or red onion in the incubation period.
- 27 20. Data from sick individuals was compared to baseline data for average consumption over
- 28

1 a given period (FoodNet Population Surveys).

2 21. Binomial comparisons of exposure to onions were statistically significant with this
3 baseline data.

4 22. A number of individuals sickened with the outbreak strain in Canada lived in long-term
5 care facilities or nursing homes.

6 23. Canadian officials gathered supply records for these facilities.

7 24. Multiple care facilities used the same supplier, which had supplied the long-term care
8 facilities with Thomson onions.

9 25. Canadian traceback efforts determined that Thomson onions were a commonality among
10 onions supplied to locations that individuals sickened with the outbreak strain reported
11 consuming onions at during the incubation period.

12 26. Four Montana restaurants (Choppers, Doc Holliday's Roadhouse, Las Margaritas, and
13 MT Pints) that individuals sickened with the outbreak strain had eaten at during the
14 incubation period were supplied by Sysco Montana and each had been supplied with
15 Thomson onions.

16 27. Four Oregon food service locations who individuals sickened with the outbreak strain
17 had eaten at during the incubation period were supplied by Sysco Portland, and each
18 location was supplied with Thomson onions.

19 28. One Arizona restaurant that individuals sickened with the outbreak strain had eaten at
20 during the incubation period was supplied by Sysco Arizona and had been supplied with
21 Thomson onions.

22 29. One food service location that individuals sickened with the outbreak strain had eaten at
23 during the incubation period, supplied by Minkus Family Farms, had been supplied with
24 Thomson Onions.

25 30. The Public Health Agency of Canada (PHAC) and the Canadian Food Inspection Agency
26 (CFIA) used the outbreak number 2007NewWGS-1MP.

27 31. The total number of Canadian cases associated with the cluster was 515.
28

32. Public health officials did not test any onions consumed by the Plaintiffs, as they had been consumed by the time of the investigation.
33. Thomson International had several food safety violations at the time of the outbreak that could have served as a vehicle for introduction or proliferation of *Salmonella* in the Thomson onions.
34. Thomson irrigated using untreated surface water in 2020.
35. Thomson had a tail water pond incident in 2020.
36. Thomson packaged onions in Bakersfield using the same equipment it packed onions in Holtville.
37. Some Thomson facilities had evidence of animal intrusion.
38. Environmental samples from Thomson's Holtville, California location identified twenty-two subsamples positive for *Salmonella*, including multiple isolates of *Salmonella* Newport. The outbreak strain was not recovered.
39. Environmental sampling at the Bakersfield, California locations produced five subsamples positive for *Salmonella* but not *Salmonella* Newport.
40. Positive environmental test results demonstrate the presence of closely related enteric pathogens in the environment even though on-farm investigation and sampling took place well after the growing season when active farm operations had shifted away from growing, harvesting, and distribution of onions.
41. A July 2021 water test performed by Michelson Laboratories, Inc., for Thomson International, Inc., returned a positive result for *Salmonella*.
42. Sadie Floding purchased a sandwich containing onions from a restaurant called Bert and Ernies.
43. Bert and Ernies used Thomson onions supplied by Sysco Montana.
44. Thomson onions were also shipped to Montana via other entities.
45. Sadie Floding reported eating foods containing onions prior to getting sick.
46. As a result of her *Salmonella* infection, Sadie Floding required medical care and incurred

1 medical bills, and also felt physically unwell.

2 47. Following her acute Salmonella infection, Sadie Floding experienced a change in her
3 bowel habits.

4 48. Plaintiff Sadie Merkel (formerly Floding)'s 2020 Salmonella s isolate's whole genome
5 sequencing was identified as part of outbreak 2007MLJJP-1 by CDC.

6 49. Plaintiff Sadie Floding had, and still has, ancillary, unrelated medical issues after
7 treatment of her Salmonella infection in July 2020.

8 50. Thomson shipped onions to entities that exported the Thomson onions to Canada.

9 51. Thomson onions were supplied to several entities in the province of Alberta.

10 52. Lynnetta Klam reported eating onions in the week prior to becoming ill.

11 53. Specifically, Lynnetta Klam consumed a homemade pizza containing onions prior to her
12 illness onset.

13 54. As a result of her Salmonella infection, Lynnetta Klam required medical care and felt
14 physically unwell.

15 55. Following her acute Salmonella infection, Lynnetta Klam experienced a change in her
16 bowel habits.

17 56. Lynnetta Klam's Salmonella isolate is included in the multinational outbreak
18 2007MLJJP-1/2007NewWGS-1MP.

19 57. Plaintiff Lynnetta Klam had, and still has, ancillary, unrelated medical issues after
20 treatment of her Salmonella infection in July 2020.

21 58. Thomson shipped onions to entities that supplied the onions to several entities in the State
22 of Oregon.

23 59. Jody Barry reported eating onions in the week prior to July 10, 2020.

24 60. As a result of her Salmonella infection, Jody Barry required medical care and incurred
25 medical bills, and also felt physically unwell.

26 61. Jody Barry remained ill into August 2020, reporting elevated stress and fatigue.

27 62. Jody Barry's 2020 Salmonella isolate's whole genome sequencing was identified as part
28

1 of outbreak 2007MLJJP-1 by CDC.

2 63. Thomson shipped onions to entities that supplied the onions to several entities in the
3 States of Oregon and Idaho.

4 64. Lori Davies reported eating onions in the week prior to July 5, 2020.

5 65. As a result of her Salmonella infection, Lori Davies required medical care and incurred
6 medical bills, and also felt physically unwell.

7 66. Following her acute Salmonella infection, Lori Davies experienced hair loss, post-
8 infectious bowel changes, and mast cell activation symptom exacerbation.

9 67. Lori Davies' 2020 Salmonella isolate's whole genome sequencing was identified as part
10 of PulseNet Cluster 2007MLJJP-1 by CDC.

11 68. Plaintiff Lori Davies had, and still has, ancillary, unrelated medical issues after her three-
12 day hospitalization in July 2020 due to her Salmonella infection.

13 69. Thomson shipped onions to entities that supplied the onions to several entities in the
14 States of Oregon and Idaho.

15 70. Matthew Peterson reported eating onions in the week prior to July 3, 2020.

16 71. As a result of her Salmonella infection, Matthew Peterson required medical care and
17 incurred medical bills, and also felt physically unwell.

18 72. Plaintiff Matthew Peterson's 2020 Salmonella isolate's whole genome sequencing was
19 identified as part of PulseNet Cluster 2007MLJJP-1 by CDC.

20 73. Plaintiff Matthew Peterson had, and still has, ancillary, unrelated medical issues after
21 treatment of his Salmonella infection in July 2020.

22 74. Thomson shipped onions to entities that supplied the onions to several entities in the State
23 of Montana.

24 75. Teisha Benson reported eating onions in the week prior to becoming ill on July 10, 2020.

25 76. Teisha Benson became ill with Salmonella Newport.

26 77. As a result of her Salmonella infection, Teisha Benson required medical care and
27 incurred medical bills, and also felt physically unwell.
28

1 78. Teisha Benson's 2020 Salmonella isolate's whole genome sequencing was identified as
2 part of outbreak 2007MLJJP-1 by CDC.

3 79. Thomson shipped onions to entities that supplied the onions to several entities in the State
4 of Colorado.

5 80. Colin Strub reported eating onions in the week prior to June 25, 2020.

6 81. Colin Strub became ill with Salmonella Newport.

7 82. As a result of his Salmonella infection, Colin Strub required medical care and incurred
8 medical bills, and also felt physically unwell.

9 83. Following his acute Salmonella infection, Colin Strub developed post-infectious irritable
10 bowel syndrome.

11 84. Plaintiff Colin Strub is a confirmed 2020 Salmonella Newport outbreak case of CDC
12 cluster code 2007MLJJP-1.

13 85. Plaintiff Colin Strub had, and still has, ancillary, unrelated medical issues after treatment
14 of his Salmonella infection in July 2020.

15 **E. DISPUTED EVIDENTIARY ISSUES/MOTIONS IN LIMINE**

16 Both parties intend to file motions in limine regarding the evidence to be used at trial. The
17 purpose of a motion in limine is to establish in advance of the trial that certain evidence should not be
18 offered at trial. "Although the Federal Rules of Evidence do not explicitly authorize in limine rulings,
19 the practice has developed pursuant to the district court's inherent authority to manage the course of
20 trials." *Luce v. United States*, 469 U.S. 38, 40 n.2 (1984); *Jonasson v. Lutheran Child and Family*
21 *Services*, 115 F. 3d 436, 440 (7th Cir. 1997). The Court will grant a motion in limine, and thereby bar
22 use of the evidence in question, only if the moving party establishes that the evidence clearly is not
23 admissible for any valid purpose. *Id.* The court does not encourage the filing of motions in limine
24 unless they are addressed to issues that can realistically be resolved by the court prior to trial and
25 without reference to the other evidence which will be introduced by the parties at trial.

26 **In advance of filing any motion in limine, counsel SHALL meet and confer to determine**
27 **whether they can resolve any disputes and avoid filing motions in limine. Along with their**
28 **motions in limine, the parties SHALL file a certification demonstrating counsel have in good**

1 **faith met and conferred and attempted to resolve the dispute. Failure to provide the**
2 **certification may result in the Court refusing to entertain the motion.**

3 Any motions in limine must be filed with the Court no later than **December 20, 2024**. The
4 motion must clearly identify the nature of the evidence that the moving party seeks to prohibit the
5 other side from offering at trial. Any opposition to the motion must be served on the other party and
6 filed with the Court no later than **January 3, 2025**. Upon receipt of any opposition briefs, the court
7 will notify the parties if it will hold a hearing on the motions in limine.

8 **1. Plaintiffs:**

9 Plaintiffs represent that they intend to move in limine to admit FDA, CDC, and Canadian
10 records as public records under Federal Rule of Evidence 803(8). (Doc. 82 at 13–14.) Additionally,
11 Plaintiffs state that they will move in limine to prohibit, exclude, or limit: (1) references to possible
12 contamination of Thomson’s onions at locations other than Thomson’s facilities; (2) reference to
13 investigations in Michigan; (3) the anticipated testimony of Dr. Melvin Kramer under Federal Rules of
14 Evidence 702 or 403; (4) the expected testimony of Dr. Martin Wiedmann; and (5) any reference to
15 substance abuse, treatment, mental health and counseling records, or medical records pertaining to
16 reproductive health. (*Id.* at 14.) Plaintiffs may file additional motions in limine. (*Id.*)

17 **2. Defendant:**

18 Thomson intends to file motions in limine to exclude the following categories of evidence:

- 19 1. Recalls of Thomson onions, under FRE 403 and 407;
- 20 2. Plaintiffs’ Medical Records as inadmissible hearsay;
- 21 3. Plaintiffs’ testimony that they had Salmonella, that they had the outbreak strain, and
22 that they were sickened by Thomson onions;
- 23 4. Testimony from Plaintiffs’ expert, Dr. Dunn, including (a) his opinion that Thomson
24 was the source of the outbreak strain, and (b) Dunn’s testimony that Plaintiff Colin
25 Strub’s Salmonella infection resulted from exposure to Thomson’s onions;
- 26 5. Evidence that Plaintiffs tested positive for the outbreak strain;
- 27 6. Testimony about possible causes of contamination of Thomson’s onions;
- 28 7. Opinions from any government agency or investigator about the cause of the 2020

Salmonella Newport outbreak or its alleged link to onions, including onions from Thomson;

8. The CDC line list of Plaintiff Colin Strub; and

9. Tests performed by Michelson Laboratories, Inc. for Thomson after August 1, 2020 as irrelevant under FRE 403.

(Doc. 82 at 15–16.)

F. SPECIAL FACTUAL INFORMATION

1. General Nature of Accident (E.D. Cal. L.R. 281(b)(6)(iv)(A)):

a. This case arises out of a 2020 outbreak of Salmonella Newport that various public health authorities linked to Defendant's onions. The outbreak sickened individuals in 48 states. Plaintiffs allege that they were exposed to Defendant's contaminated onions and developed Salmonella Newport illnesses. Plaintiffs contend that Defendant failed to follow proper industry standards to prevent its products from becoming contaminated. Plaintiffs assert claims of strict products liability, breach of warranty, and negligence, as well as negligence per se claims in connection with Thomson's production and sale of onions contaminated with Salmonella Newport. Plaintiffs all allege they sustained Salmonella by consuming Defendant's contaminated onions. Because this matter involves product liability claims, strict liability applies. As in the *Angelo v. Thomson* case, only the strict liability claim should be submitted to the jury.

2. Specific Information Regarding Each Plaintiff (E.D. Cal. L.R. 281(b)(6)(iv)(B)):

- a. Plaintiff Jody Barry is 55 years old. Jody sustained a Salmonella infection, experiencing elevated stress and fatigue. She had no prior injuries and incurred \$11,475.40 in expected past and future medical expenses. She was at least partially disabled between July and September of 2020. She is not raising a wage loss claim.
- b. Plaintiff Teischa Benson is 31 years old. Teischa sustained a Salmonella infection. Teischa had no prior injuries, incurred \$3,913.19 in expected past and future medical expenses, and was at least partially disabled in July 2020. Teischa is not raising a wage loss claim.

- 1 c. Plaintiff Lori Davies is 52 years old. Davis sustained a Salmonella infection, sepsis,
2 hair loss, post-infectious irritable bowel syndrome/SIBO, bloating and pain. She
3 suffered worsened polyarthritis in her hands, feet, and legs, and worsened mast cell
4 activation. Davies incurred \$18,373.66 in expected past and future medical expenses.
5 She expects future treatment to include visits to specialists who treat IBS and various
6 IBS treatments. Davies has been at least partially disabled from July 2020 until the
7 present. Davies is not raising a wage loss claim.
- 8 d. Plaintiff Sadie Floding is 28 years old. Floding sustained a Salmonella infection and
9 post-infectious irritable bowel syndrome. She had no prior injury or condition. She has
10 incurred \$5,813.69 in past and future medical expenses and expects future treatment to
11 include visits to specialists who treat IBS and various IBS treatments. She has been at
12 least partially disabled from July 2020 until present. Floding is not raising a wage loss
13 claim.
- 14 e. Plaintiff Lynnetta Klam is 62 years old. She sustained a Salmonella infection, post-
15 infectious irritable bowel syndrome, bloating, and pain. She has not stated an amount
16 in past or expected future medical expenses. She expects future treatment to include
17 visits to specialists who treat IBS, and various treatments for IBS. She has been
18 disabled from July 2020 until the present. Klam is not raising a wage loss claim.
- 19 f. Plaintiff Matthew Peterson is 35 years old. He sustained a Salmonella infection.
20 Peterson had no prior injury or condition. He has incurred \$7,194.00 in past and future
21 medical expenses and was at least partially disabled between July and August of 2020.
22 Peterson is not raising a wage loss claim.
- 23 g. Plaintiff Colin Strub is 45 years old. He sustained a Salmonella infection, post-
24 infectious irritable bowel syndrome, bloating, and pain. He experienced a worsening of
25 his prior condition of Gastroesophageal reflux disease (“GERD”) with esophagitis and
26 Shatzkis ring. Strub has incurred \$117,708.54 in past and future medical expenses and
27 expects to have medical bills related to the treatment of his post-infectious IBS, and the
28 management thereof. He has been at least partially disabled from July 2020 until the

present. He is not raising a wage loss claim.

G. RELIEF SOUGHT

Plaintiffs seek compensatory damages for past and future medical expenses, lost income, and general damages including pain, suffering, mental and physical discomfort, emotional distress, loss of enjoyment of life, diminished quality of life, and other non-economic damages. Defendant has not made a specific request for relief in the parties' Joint Pretrial Statement.

H. ABANDONED ISSUES

The following affirmative defenses have been abandoned by Defendant Thomson International: Failure to State a Claim; Failure to Mitigate; Performance; No Warranties; and Failure to Join Necessary Parties.

I. WITNESSES

1. The following is a list of witnesses that the parties expect to call at trial, including rebuttal and impeachment witnesses. NO WITNESS, OTHER THAN THOSE LISTED IN THIS SECTION, MAY BE CALLED AT TRIAL UNLESS THE PARTIES STIPULATE OR UPON A SHOWING THAT THIS ORDER SHOULD BE MODIFIED TO PREVENT "MANIFEST INJUSTICE." Fed. R. Civ. P. 16(e); Local Rule 281(b)(10).

1. Plaintiffs' Witnesses

1. Jack Thomson
2. Nancy Anspach
3. Shantee Bonilla
4. Neftali Hernandez
5. Nancy Lugo
6. David Marquez
7. Trevor Flint, or other Onions 52 Designee
8. John R. Dunn, DVM, Ph.D.
9. Theodoros Kelesidis, MD, MSc, PhD
10. Myung (Scott) Choi, MD
11. Zachary D. McCormic

12. Marjorie Schultz
13. Christian Bond
14. Sadie Floding Merkel
15. Ronell Floding
16. Steve Floding
17. Tucker Merkel
18. Toby Dewolf – Owner, Bert & Ernies
19. Sysco Montana designee
20. Diane P Nowak, MD
21. Lynnetta Klam
22. Paul Forgues
23. Ashley Davis
24. Matthew Davis
25. William Lau, MD
26. David Gaunt
27. Dennis Todoruk MD
28. Lance Honish MSc
29. Jody Barry
30. Rob Barry
31. Vincent Barry
32. Jake Barry
33. Paul V Podett, MD
34. Lori Davies
35. Lee Davies
36. Joseph Davies
37. Owen Davies
38. Karl Kaluza, DO

39. Kursteen Price, MD
40. Matthew Peterson
41. Celina Fugate
42. Tracey Frost
43. Josh Purcell
44. Raagav Mohanakrishnan, MD
45. Teisha Benson
46. Aaron Benson
47. Tim Stinton, PA-C
48. Colin Strub
49. Brita Strub
50. Daniel Siegel, MD
51. Hanna M Kraus, MD
52. Isaac D Pierre, MD
53. Christopher Paul Schultz, MD
54. Records custodians for Plaintiffs' medical providers to provide foundation for medical records and bills
55. Employees or agents of FDA to provide evidentiary foundation for FDA records
56. Employees or agents of CDC to provide evidentiary foundation for CDC records
57. Employees or agents of California Department of Public Health to provide foundation for CDPH records
58. Employees or agents of PHAC to provide foundation for PHAC records
59. Employees or agents of Alberta Health Services to provide foundation for Alberta Health Services records.
60. Employees or agents of CFIA to provide foundation for CFIA records
61. Employees or agents of entities in the chain of distribution, including customers identified by Thomson International, entities or individuals named in shipping

documents, or entities named by Onions 52, Inc., or Sysco-related entities, and any downstream recipient of recalled Thomson International onions or products containing Thomson onions.

2. *Defendant's Witnesses*

1. Jack Thomson
2. Elaine Thomson
3. Nancy Anspach
4. Nancy Lugo
5. Shantee Bonilla
6. Neftali Hernandez
7. David Marquez
8. Aaron Kaiser, Michelson Laboratories, Inc. of Northern California
9. Ambre Sharkey, Primus
10. Expert Witness, Martin Wiedmann, Dr. med. vet, Ph.D.
11. Expert Witness, Melvin Kramer, Ph.D., M.P.H.
12. Expert Witness, Daniel Coto, M.P.H., R.E.H.S.
13. Expert Witness, Stephen Blackwell, M.S., R.E.H.S.
14. Expert Witness, Jonathan Ellis, M.D., F.A.C.P. , Q.M.E.
15. Expert Witness, Daniel Wallace, M.D., F.A.C.P., M.A.C.R

2. **The court does not allow undisclosed witnesses to be called for any purpose, including impeachment or rebuttal, unless they meet the following criteria:**

- a. The party offering the witness demonstrates that the witness is for the purpose of rebutting evidence that could not be reasonably anticipated at the pretrial conference, or
- b. The witness was discovered after the pretrial conference and the proffering party makes the showing required in paragraph B, below.

3. Upon the post pretrial discovery of any witness a party wishes to present at trial, the party shall promptly inform the court and opposing parties of the existence of the unlisted witnesses so the

1 court may consider whether the witnesses shall be permitted to testify at trial. The witnesses will not be
2 permitted unless:

- 3 a. The witness could not reasonably have been discovered prior to the discovery cutoff;
- 4 b. The court and opposing parties were promptly notified upon discovery of the witness;
- 5 c. If time permitted, the party proffered the witness for deposition; and
- 6 d. If time did not permit, a reasonable summary of the witness's testimony was provided
7 to opposing parties.

8 **J. EXHIBITS, SCHEDULES AND SUMMARIES**

9
10 Plaintiffs' Exhibits are those listed in Plaintiffs' Exhibit A, as attached to the parties' Joint
11 Pretrial Statement. (Ex. A, Doc. 82-1.) The Court incorporates Plaintiffs' Exhibit List by reference and
12 will refer to them as "Attachment A" to this Order.

13 Defendant's Exhibits are those listed in Exhibit B to the parties' Joint Pretrial Statement, as
14 attached to the parties' Joint Pretrial Statement. (Ex. B, Doc. 82-2.) The Court incorporates
15 Defendant's Exhibit List by reference and will refer to them as "Attachment B" to this Order.

16 NO EXHIBIT, OTHER THAN THOSE LISTED IN ATTACHMENTS A-B, MAY BE
17 ADMITTED UNLESS THE PARTIES STIPULATE OR UPON A SHOWING THAT THIS ORDER
18 SHOULD BE MODIFIED TO PREVENT "MANIFEST INJUSTICE." Fed. R. Civ. P. 16(e); Local
19 Rule 281(b)(11).

20 1. **For a party to use an undisclosed exhibit for any purpose, they must meet the**
21 **following criteria:**

- 22 a. The party proffering the exhibit demonstrates that the exhibit is for the purpose of
23 rebutting evidence that could not have been reasonably anticipated, or
- 24 b. The exhibit was discovered after the issuance of this order and the proffering party
25 makes the showing required in paragraph 2, below.

26 2. Upon the discovery of exhibits after the discovery cutoff, a party shall promptly inform
27 the court and opposing parties of the existence of such exhibits so that the court may consider their
28 admissibility at trial. The exhibits will not be received unless the proffering party demonstrates:

- a. The exhibits could not reasonably have been discovered earlier;
- b. The court and the opposing parties were promptly informed of their existence; and
- c. The proffering party forwarded a copy of the exhibits (if physically possible) to the opposing party. If the exhibits may not be copied the proffering party must show that it has made the exhibits reasonably available for inspection by the opposing parties.

On or before **November 15, 2024** counsel **SHALL** meet and confer to discuss any disputes related to the above listed exhibits and to pre-mark and examine each other's exhibits. Any exhibits not previously disclosed in discovery **SHALL** be provided via e-mail or overnight delivery so that it is received by the above exhibit exchange deadline.

1. At the exhibit conference, counsel will determine whether there are objections to the admission of each of the exhibits and will prepare separate indexes; one listing joint exhibits, one listing Plaintiff's exhibits and one listing Defendant's exhibits. In advance of the conference, counsel must have a complete set of their proposed exhibits to be able to fully discuss whether evidentiary objections exist. Thus, any exhibit not previously provided in discovery SHALL be provided at least five court days in advance of the exhibit conference.

2. At the conference, counsel shall identify any duplicate exhibits, i.e., any document which both sides desire to introduce into evidence. These exhibits **SHALL** be marked as joint exhibits and numbered as directed above. Joint exhibits **SHALL** be admitted into evidence upon introduction and motion of a party, without further foundation.

All joint exhibits will be pre-marked with numbers preceded by the designation "JT" (e.g. JT/1, JT/2, etc.). Plaintiff's exhibits will be pre-marked with numbers beginning with 1 by the designation PX (e.g. PX1, PX2, etc.). Defendant's exhibits will be pre-marked with numbers beginning with 501 preceded by the designation DX (e.g. DX501, DX502, etc.). The parties **SHALL** number each page of any exhibit exceeding one page in length (e.g. PX1-1, PX1-2, PX1-3, etc.).

If originals of exhibits are unavailable, the parties may substitute legible copies. If any document is offered that is not fully legible, the Court may exclude it from evidence.

Each joint exhibit binder shall contain an index which is placed in the binder before the exhibits. The index shall consist of a column for the exhibit number, one for a description of the

exhibit and one column entitled “Admitted in Evidence” (as shown in the example below).

INDEX OF JOINT EXHIBITS

EXHIBIT#	DESCRIPTION	ADMITTED IN EVIDENCE

3. As to any exhibit which is not a joint exhibit but to which there is no objection to its introduction, the exhibit will likewise be appropriately marked, i.e., as PX1, or as DX501 and will be indexed as such on the index of the offering party. Such exhibits will be admitted upon introduction and motion of the party, without further foundation.

4. Each exhibit binder shall contain an index which is placed in the binder before the exhibits. Each index shall consist of the exhibit number, the description of the exhibit and the three columns as shown in the example below.

INDEX OF EXHIBITS

EXHIBIT#	DESCRIPTION	ADMITTED IN EVIDENCE	OBJECTION FOUNDATION	OBJECTION OTHER

5. On the index, as to exhibits to which the only objection is a lack of foundation, counsel will place a mark under the column heading entitled “Objection Foundation.”

6. On the index, as to exhibits to which there are objections to admissibility that are not based solely on a lack of foundation, counsel will place a mark under the column heading entitled “Other Objections.”

7. As to each exhibit which is not objected to in the index, it shall be marked and received into evidence and will require no further foundation.

After the exhibit conference, Plaintiff and counsel for the defendants **SHALL** develop four complete, legible sets of exhibits. The parties **SHALL** deliver three sets of their exhibit binders to the Courtroom Clerk and provide one set to their opponent, no later than 4:00 p.m., on **January 16, 2025**. Counsel **SHALL** determine which of them will also provide three sets of the joint exhibits to the

1 Courtroom Clerk.

2 7. The Parties **SHALL** number each page of any exhibit exceeding one page in length.

3 **K. POST-TRIAL EXHIBIT RETENTION**

4 **Counsel who introduced exhibits at trial SHALL retrieve the original exhibits and the**
5 **exhibit binders from the courtroom deputy following the verdict in the case. The parties' counsel**
6 **SHALL retain possession of and keep safe all exhibits until final judgment and all appeals are**
7 **exhausted.**

8 **L. DISCOVERY DOCUMENTS**

9 The following is a list of discovery documents – portions of depositions, answers to
10 interrogatories, and responses to requests for admissions – that the parties expect to offer at trial.
11 NO DISCOVERY DOCUMENT, OTHER THAN THOSE LISTED IN THIS SECTION, MAY BE
12 ADMITTED UNLESS THE PARTIES STIPULATE OR UPON A SHOWING THAT THIS ORDER
13 SHOULD BE MODIFIED TO PREVENT “MANIFEST INJUSTICE.” Fed. R. Civ. P. 16(e); Local
14 Rule 281(b)(12).

15 **1. Plaintiffs' Documents**

16 Plaintiffs intend to use Defendant's Answers to Interrogatories (all) and Responses to Requests
17 for Admission. Plaintiffs also intend to use the deposition of Onions 52 in the event a witness is
18 unavailable for trial.

19 Plaintiffs intend to use portions of the videotaped depositions of Defendant's experts.

20 Plaintiffs reserve the right to use any and all portions of depositions, answers to interrogatories,
21 and responses to requests for admission for impeachment and/or rehabilitation purposes.

22 **2. Defendant's Documents**

23 Defendant intends on proffering the following discovery documents for each Plaintiff at trial:

24 **a. Jody Barry**

- 25 i. Answers to Interrogatories, Set One, Nos. 3, 6, 12, 13, 14.
26 ii. Amended Answers to Interrogatories, Set One, No. 17.
27 iii. Response to Requests for Production, Set One, Nos. 1, 2, 5, 6, 7.
28

iv. Amended Response to Request for Production, Set One, Nos. 14, 15.

b. **Teischa Benson**

i. Amended Answers to Interrogatories, Set One, No. 17.

ii. Response to Request for Production, Set One, Nos. 1, 2, 5, 6, 7, 12, 14, 15.

iii. Amended Response to Request for Production, Set One, Nos. 14, 15.

c. **Lori Davies**

i. Answers to Interrogatories, Set One, No. 6.

ii. Response to Request for Production, Set One, No. 1, 2, 5, 6, 7, 12.

iii. Amended Answers to Interrogatories, Set One, No. 17.

iv. Amended Response to Request for Production, Set One, No. 14, 15.

d. **Sadie Floding**

i. Amended Answers to Interrogatories, Set One, No. 17.

ii. Response to Request for Production, Nos. 1, 2, 5, 6, 7.

e. **Lynnetta Klam**

i. Answers to Interrogatories, Set One, No. 6.

ii. Amended Answers to Interrogatories, Set One, No. 17.

iii. Responses to Request for Production of Documents, Set One, Nos. 1, 2, 5, 6, 7, 14, 15.

iv. Amended Responses to Request for Production of Documents, Set One, Nos. 14, 15.

f. **Matthew Peterson**

i. Answers to Interrogatories, Set One, No. 6.

ii. Amended Answers to Interrogatories, Set One, No. 17.

iii. Responses to Request for Production of Documents, Set One, Nos. 1, 2, 5, 6, 7, 12, 14, 15.

iv. Amended Response to Request for Production of Documents, Set One, Nos. 14, 15.

g. **Colin Strub**

- i. Amended Answers to Interrogatories, Set One, No. 17.
- ii. Responses to Request for Production of Documents, Set One, Nos. 1, 2, 5, 6, 7, 12.

Defendant also intends on proffering its own discovery responses at trial, specifically, Defendants' Responses to Plaintiffs' Interrogatories, Set One, Nos. 1–8. Defendant reserves the right to use deposition testimonies and discovery responses other than those listed above.

M. FURTHER DISCOVERY OR MOTIONS

No further discovery is sought by either party.

N. STIPULATIONS

The parties have not agreed upon any stipulations. Plaintiffs request stipulation to medical records and bills.

O. AMENDMENTS/ DISMISSALS

Plaintiff Carson Brenda was dismissed from this case. (Doc. 76.)

P. SETTLEMENT NEGOTIATIONS

Thomson believes a settlement conference would not be helpful.

Q. AGREED STATEMENT

In this case, plaintiffs all suffered from diarrhea during the summer of 2000. They contend it was caused by Salmonella infections caused by exposure to onions grown by defendant Thomson. Plaintiffs brought their case against Thomson seeking damages for their alleged injuries.

R. SEPARATE TRIAL OF ISSUES

None requested at this time.

S. APPOINTMENT OF IMPARTIAL EXPERTS

None requested.

T. ATTORNEYS' FEES

The parties agree that each side is responsible for its own attorneys' fees.

U. TRIAL DATE/ ESTIMATED LENGTH OF TRIAL

Jury trial is set for January 22, 2025, at 8:30 a.m. before the Honorable Jennifer L. Thurston at

1 the Robert E. Coyle United States Courthouse, 2500 Tulare Street, Fresno, California. Trial is expected
2 to last 20 days.

3 **V. TRIAL PREPARATION AND SUBMISSIONS**

4 **1. Trial Briefs**

5 The parties are relieved of their obligation under Local Rule 285 to file trial briefs. If any party
6 wishes to file a trial brief, they must do so in accordance with Local Rule 285 and be filed on or before
7 **January 8, 2025**.

8 **2. Jury Voir Dire**

9 The parties are required to file their proposed voir dire questions, in accordance with Local
10 Rule 162.1, on or before **January 8, 2025**.

11 **3. Jury Instructions & Verdict Form**

12 The parties shall serve, via e-mail or fax, their proposed jury instructions in accordance with
13 Local Rule 163 and their proposed verdict form on one another no later than **December 26, 2024**. At
14 the conference, the parties **SHALL** attempt to reach agreement on jury instructions and verdict form
15 for use at trial. The parties shall file all agreed-upon jury instructions and verdict form no later than
16 **January 8, 2025**, and identify such as the agreed-upon jury instructions and verdict forms. At the
17 same time, the parties **SHALL** lodge via e-mail a copy of the joint jury instructions and joint verdict
18 form (in Word format) to JLTOrders@caed.uscourts.gov.

19 **If and only if, the parties after genuine, reasonable and good faith effort** cannot agree upon
20 certain specific jury instructions and verdict form, the parties shall file their respective proposed
21 (disputed) jury instructions and proposed (disputed) verdict form no later than **January 8, 2025**, and
22 identify such as the disputed jury instructions and verdict forms. At the same time, the parties
23 **SHALL** lodge via e-mail, a copy of his/their own (disputed) jury instructions and proposed (disputed)
24 verdict form (in Word format) to JLTOrders@caed.uscourts.gov.

25 In selecting proposed instructions, the parties shall use Ninth Circuit Model Civil Jury
26 Instructions or California's CACI instructions to the extent possible. All jury instructions and verdict
27 forms shall indicate the party submitting the instruction or verdict form (i.e., joint, plaintiff's,
28 defendant's, etc.), the number of the proposed instruction in sequence, a brief title for the instruction

describing the subject matter, the **complete** text of the instruction, and the legal authority supporting the instruction. Each instruction **SHALL** be numbered.

W. OBJECTIONS TO PRETRIAL ORDER

Within 14 days after the date of service of this order, the parties may file written objections to any of the provisions set forth in this order. The parties may file any replies to the objections within seven days. The objections shall clearly specify the requested modifications, corrections, additions or deletions. **If no objections are filed, the order will become final without further order of the Court.**

The parties are reminded that pursuant to Rule 16(e) of the Federal Rules of Civil Procedure and Local Rule 283, this order shall control the subsequent course of this action and shall be modified only to prevent manifest injustice.

X. MISCELLANEOUS MATTERS

I. The parties are advised that due to the Court's trial schedule, it is unlikely that their trial will proceed as currently scheduled. Rather, the Court will trail their trial from day-to-day until the trial, which is in line ahead of theirs, finishes. The parties are reminded of the availability of the Magistrate Judge to preside over their trial and who would be able to hear their trial promptly. The Magistrate Judge is extremely experienced and qualified to preside over their trial, and the parties would retain the same appellate rights they would have otherwise. The parties **SHALL** reconsider whether they will consent to magistrate judge jurisdiction for trial and **SHALL** file a notice of their consent or decline to magistrate judge jurisdiction, **no later than November 4, 2024.**

II. Counsel are advised that the Court's trial schedule, absent other court conflicts, is as follows: The first day of trial and until jury selection is completed, the trial day will begin at 8:30 a.m. and complete around 4:30 p.m. with an hour-long lunch break. Until the jury begins deliberating, the trial day will begin at 8:00 a.m. and complete at 1:30 p.m. with no lunch break, though the trial will break for two breaks during the trial day. Once the jury begins deliberating, the jury will set their own schedule.

Additionally, the Court notes that witnesses Neftali Hernandez and David Marquez will need Spanish language interpreters at trial. **The party proffering the witnesses are responsible for providing a federally certified court interpreter.** Plaintiffs request the ability to call witnesses

1 through videoconferencing, *e.g.*, Zoom. Counsel **SHALL** confer and come to agreement as to this
2 presentation of witnesses by Zoom.

3 **Y. COMPLIANCE**

4 Strict compliance with this order and its requirements is mandatory. All parties and their
5 counsel are subject to sanctions, including dismissal or entry of default, for failure to fully comply
6 with this order and its requirements.

7
8 IT IS SO ORDERED.

9 Dated: **October 7, 2024**


UNITED STATES DISTRICT JUDGE

Attachment A

The following is Plaintiffs' Exhibit List, as incorporated here:

General Liability Exhibits

UT HD Outbreak Records	OFTPLAINTIFFS1-15
WA DOH Line List	OFTPLAINTIFFS 16-399
CA HD Outbreak Records	OFTPLAINTIFFS400-417
Canadian recall list	NLOPLAINTIFFS00418-438
FDA report	NLOPLAINTIFFS 439-453
CA DPH report	NLOPLAINTIFFS 454-460
FDA Core Report	NLOPLAINTIFFS 461-626
FDA_Onions 52 Customer List - CONFIDENTIAL	NLOPLAINTIFFS 627
Zalco Labs Subpoena Docs	NLOPLAINTIFFS 628-646
Michelson Labs Subpoena Docs	NLOPLAINTIFFS 647-680
Correspondence	ALBMT1-1188
Recall Documents	ALBMT1189-1576
Invoices	ALBMT1577-1581
Kroger Subpoena fee schedule	NLOPLAINTIFFS681
Subpoena response	NLOPLAINTIFFS 682-3
Recall documents	NLOPLAINTIFFS 684-99
Recall documents	NLOPLAINTIFFS 700-731
Angelo v. Thomson - Flint Declaration	NLOPLAINTIFFS 732-5
Hanley v. Thomson - Supp Dec of Trevor Flint	NLOPLAINTIFFS 736-8
Hanley v. Thomson - Supp Dec of Trevor Flint Exhibits A-D	NLOPLAINTIFFS 739-914
Sobeys Tuscany Email response	NLOPLAINTIFFS 915

1	Super 1 Response	NLOPLAINTIFFS 916
2	Uwajimaya Beaverton Email exchange	NLOPLAINTIFFS 917-919
3	Isolates PDS000002596	NLOPLAINTIFFS 920
4	Costco objections	NLOPLAINTIFFS 921-926
5	Canada Food safety investigation	NLOPLAINTIFFS 927-933
6	Amazon's objections	NLOPLAINTIFFS 934-939
7	Albertsons objections	NLOPLAINTIFFS 940-41
8	FDA Inspection Records and Test Results	
9	California Inspection Records and Test Results	
10	All deposition exhibits	
11	Primus Audits 2019	
12	Primus Audits 2018	
13	Onion Food Safety Program	TII000003617-3645, 3553-3569
14	Emails regarding FSMA	TII000016977-16981
15	Master Sanitation SOP	TII000003465-3473
16	Food Defense Plan	TII000003619-3645
17	Holtville Organizational Chart	TII000032078
18	Traceback Diagrams	
19	Thomson Onion 2020 Sales by Ship To Address	
20	Primus Audit suspension email	TII000020262
21	Emails regarding Food Safety	TII000017510
22		
23		
24		
25		
26		
27		
28		

1	Water Microbiological Testing SOP	TII000032174-32177
2	Risk Assessment of Growing Operation SOP	TII000032067
3	GAP Food Safety Plan	TII000032073-32077
4	Trace back & Recall Plan	TII000032197-323222
5	GAP SOP	TII0000175639 et seq. (Lugo Exhibit 18, Bates range out of order)
6	2020 Onion Operation Details	TII000018894-18913
7	Food Safety Policy Statement	TII0000049337
8	Email regarding high E. coli tests	TII000017603
9	Email regarding dumped yellow onions	TII000023250-23261
10	Moldy onion report	TII000020674
11	Letter to FDA, CDC, and CFIA	TII000002936
12	Press release	TII000021838
13	Email protesting FDA Outbreak Investigation Report	TII00002962-2963
14	Answers to FDA Questions	TII000020024-20032
15	FDA Investigation Report	Thomson Exhibit 30
16	FDA Discussion Points from Thomson Inspection	TII000002758-2760
17	Emails regarding corrective actions	TII000025851-24854
18	Emch & Waite-Cusic (2016), Conventional Curing Practices Reduce Generic E. coli and Salmonella spp. on dry bulb onions produced with contaminated irrigation water	
19	Grower Water Source Inspections SOP	TII000032157-32159
20	Pre-harvest Risk Assessment	TII000032419

1	Documents produced by Dr. Martin Wiedmann	
2	Testing & Inspections from Wiedmann file No. 25	
3	Invoices and Bills of Lading	
4	Invoices and Bills of Lading Summary	
5	Alberta Health FOIA Records from Wiedmann File No. 10	
6	Oregon Health Authority Records Wiedmann file No. 33	
7	CDPH Records from Wiedmann file	
8	Audit Reports from Wiedmann file Nos. 21 & 27	
9	Documents produced by Dr. Melvin Kramer	
10	Linelists for each Plaintiff	
11	2020 Lot Chart	TII000017723
12	Production Diagrams	
13	Purchase Orders and Invoices	
14	Purchase Orders and Invoices Spreadsheet	TII000022123
15	Load and Ship Date Spreadsheets	TII000025546, 25571, 25633 (Natives)
16	Risk Assessment Spreadsheets	TII000032264-32588 (Natives)
17	Email regarding positive samples	TII000002682-2683
18	Zenith correspondence regarding Sysco	TII000021346-21347
19	Reports of Sample Analysis (FDA test results) positive for Salmonella	Various
20	Chart of positive test results	TII000021267
21	Email regarding positive samples	TII000021259
22		
23		
24		
25		
26		
27		
28		

Invoices and bills of lading provided to FDA	TII000019928 et seq., TII000019938 et seq., TII000019947 et seq.
Emails regarding orders to FDA	TII000019924 et seq.
Recall letter	TII000019429-19430
Lot number designation provided to FDA	TII000018894
KOR/Onions 52/ Thomson 2020 List	TII000018890 et seq.
Colorado Investigation Summary	TII000045768 et seq.
Multi-provincial cluster of Salmonella Newport Final investigation summary – applicant copy	TII000068082-68781
Canadian records	TII00084202-86711
NCBI Isolates Browser (in real time) for Plaintiffs’ isolates and the outbreak strain https://www.ncbi.nlm.nih.gov/pathogens/isolates	
Any document identified by Defendant	

Onions 52 Exhibits

Onions 52 Customer List	NLOPLAINTIFFS00627
Growing, Sales, and Marketing Agreement	TII000067856-67865
Declaration of Trevor Flint, Onions52	TII000067866-67869
Onions52 order detail report	TII000067870-67876
Onions52 order detail report	TII000067877-67900
Onions52 bill of lading	TII000067901
Onions42 invoices to purchasers	TII000067902-67913
Onions52 Bill of lading	TII000067914-5
Onions52 depo transcript from 8/31/23 – Trevor Flint	TII000067916-68081
Supplemental Declaration of Trevor Flint, Onions52	TII00068782-68784
Declaration of Trevor Flint, Onions52	TII00068785-68788

Expert Reports

Report of Dr. John Dunn	
Rebuttal Report of Dr. John Dunn	
McCormic Article	
Dunn CV	

Documents identified by Dr. Dunn	
Report of Dr. Theodoros Kelesidis	
Dr. Kelesidis CV	
Documents identified by Dr. Kelesidis	
Report of Dr. Myung (Scott) Choi	
Dr. Choi CV	
Documents identified by Dr. Choi	

Defense Experts

EHA Consulting Website	
Kramer/EHA Consulting Firm Invoices	
Dr. Wiedmann Invoices	
Dr. Wiedmann Emails	
Dr. Ellis Invoices	
Dr. Ellis Emails	
Documents Provided to Defense Experts	

Barry, Jody

Records

Legacy Mount Hood	BARRY000023-BARRY000081
Legacy - GoHealth Urgent Care	BARRY000082-BARRY000089 BARRY000096-BARRY000099
Mountain View Family Practice	BARRY000142-BARRY000498

Bills:

Legacy Mount Hood	BARRY000093-BARRY000094
Mountain View Family Practice	BARRY000126-BARRY000141

Health Department Records:

Multnomah County Health Department Records	BARRY000001-BARRY000018 TII000046030
Oregon State Health Authority	BARRY000019-BARRY000022
Emails with Multnomah County	BARRY000499-BARRY000508
CDC FOIA Response	BARRY000509-BARRY000611

Proof of Purchase:

Rivermark Community Credit Union Bank Statements	BARRY000104-BARRY000125 BARRY000612-BARRY000619
Bajio Mexican Grill Letter	BARRY000620

Benson, Teischa

Records:

Great Falls Clinic	BENSON000001-BENSON000371
--------------------	---------------------------

Bills:

Great Falls Clinic	BENSON000372-BENSON000381
Walgreens	BENSON000411-BENSON000422 **Misnumbered

Health Department Records:

Cascade County Health Department	BENSON000382-BENSON000408
CDC FOIA Response	BENSON000423-BENSON000519

Proof of Purchase:

Embark Federal Credit Union Statements	BENSON000412-BENSON000415
Albertsons Club Account and Transaction Details	ALBBENSON0001-ALBBENSON0002

Davies, Lori

Records:

Rebound Division of Northwest Surgical Specialists, P.C.	DAVIES000029-DAVIES000129 TII000045027-TII000045479
Allergy, Asthma and Dermatology Associates, P.C.	DAVIES000137-DAVIES000153
NW Dermatology Institute	DAVIES000219-DAVIES000222
Myriad myRisk	DAVIES000239
The Oregon Clinic, Center for Advanced Surgery	DAVIES000240 TII000067280-TII000067287
Biolounge Nutrition	DAVIES000245-DAVIES000252
Providence Health & Services	DAVIES000260-DAVIES000601
Northwest Rheumatology Associates	TII000067251-TII000067276
Plaza Ambulatory Surgery Center, LLC	TII000067288-TII000067295

Bills:

The Wig Gallery	DAVIES000002-DAVIES000003
TRG, LLC; formerly The Radiology Group	DAVIES000023 DAVIES000603 TII000045480-TII000045483
NW Surgical Specialists PC	DAVIES000130-DAVIES000131 TII000045016-TII000045026
Providence Health & Services	DAVIES000155-DAVIES000213
NW Dermatology Institute	DAVIES000214
Biolounge Nutrition	DAVIES000241-DAVIES000244

Providence Health & Services	DAVIES000253-DAVIES000259
------------------------------	---------------------------

Health Department Records:

CDC Linelist	DAVIES000001
Washington County Health Department	DAVIES000004-DAVIES000019 TII000046102
Oregon State Health Authority	DAVIES000020-DAVIES000022
CDC FOIA Response	DAVIES000608-DAVIES000704

Proof of Purchase:

Capital One Statements	DAVIES000232-DAVIES000236
------------------------	---------------------------

Photos

Before and after photos of hair	DAVIES000223-DAVIES000231
---------------------------------	---------------------------

Floding, Sadie

Records:

Video from ER	FLODING000002
St. Peters Health	FLODING000489-FLODING000493 FLODING000500-FLODING000555 FLODING001302-FLODING001320 FLODING001323 FLODING001339-FLODING001482
Prometheus Therapeutics & Diagnostics	FLODING001321
Mountain West Pathology Report	FLODING001322

Bills:

Lewis and Clark Emergency Physicians	FLODING000485 FLODING000488
St. Peter's Health	FLODING000486-FLODING000487 FLODING000494 FLODING000499 FLODING001324-FLODING001325 FLODING001329-FLODING001335

Health Department Records:

CDC Linelist	FLODING000001
Montana Public Health Department	FLODING000003-FLODING000484
CDC Emails	FLODING000559-FLODING001256
CDC FOIA Response	FLODING001483-FLODING001487

Proof of Purchase:

American Express Statements	FLODING001257-FLODING001283
US Bank Statements	FLODING001284-FLODING001297

Albertsons Club Account and Transaction Details	ALBFLODING0001-ALBFLODING0002
Bert and Ernie's Subpoena Response	FLODING001488-FLODING001494

Klam, Lynnetta

Records:

South Common Medical Centre	KLAM000017-KLAM000031 KLAM000114
University of Alberta	KLAM000041-KLAM000044 TII00067214-TII0006722
Montgomery Pinnacle Medical Centres	KLAM000047-KLAM000060 KLAM000069-KLAM000070 KLAM000080-KLAM000094 KLAM000103-KLAM000104 KLAM000115-KLAM000123
Alberta Health Services, including Royal Alexandria and Red Deer Regional Hospital Center	KLAM000032-KLAM000040 KLAM000061-KLAM000068 KLAM000095-KLAM000102 KLAM000124-KLAM000500 TII000063549-TII000063557
Mayfair Diagnostics	KLAM000071 KLAM000105
Rejuvenation Dermatology Calgary South	KLAM000072-KLAM000076 KLAM000106-KLAM000110
Hearing Loss Clinic	KLAM000077-KLAM000079 KLAM000111-KLAM000113
Heritage Valley Town Centre	KLAM000506-KLAM000508

Health Department Records:

Health Canada and Public Health Agency of Canada	KLAM000001-KLAM000012
Public Health Agency of Canada	TII00084202-TII00086711

Exposure Evidence:

Royal Bank Statements	KLAM000509-KLAM000513
Email from daughter	KLAM000501-KLAM000502
Video from daughter	KLAM000503
Photo of pizza	KLAM000504
Metadata of pizza	KLAM000505

Peterson, Matthew

Records:

Kaiser Permanente	PETERSON000009-PETERSON000037 PETERSON000065-PETERSON000173
-------------------	--

Bills:

Kaiser Permanente	PETERSON000002-PETERSON000004 PETERSON000038 TII000045484-TII000045493 TII000045504
-------------------	--

Health Department Records:

Clackamas County Health Department	PETERSON000039-PETERSON000058 TII000046073
Oregon State Health Authority	PETERSON000059-PETERSON000061

Proof of Purchase:

Great Wolf Lodge Subpoena Responses	PETERSON000176-PETERSON000241
-------------------------------------	-------------------------------

Strub, Colin

Records:

Denver Digestive Health Specialists	STRUB000005 STRUB000037-STRUB000042 STRUB000062-STRUB000063 STRUB000079-STRUB000084 STRUB000586-STRUB000592 STRUB000613-STRUB000615
Denver Endoscopy Center	STRUB000043-STRUB000047 STRUB000059-STRUB000061 STRUB000085-STRUB000107 STRUB000593-STRUB000612 STRUB000616-STRUB000630
Healthone Rose Medical Center	STRUB000048-STRUB000050 STRUB000064-STRUB000065 STRUB000580-STRUB000583
EPC Clinic	STRUB000051-STRUB000057
LabCorp	STRUB000058 STRUB000066-STRUB000068
Kaiser Permanente	STRUB000108-STRUB000120 STRUB000127-STRUB000476

UC Health	STRUB000491-STRUB000569 STRUB000755-STRUB000782 STRUB000793-STRUB000797
Colorado Department of Public Health & Environment	STRUB000577
Colorado GI Pathology	STRUB000584-STRUB000585
St. Joseph Hospital	STRUB000631-STRUB000750
Physical Therapy Specialists	STRUB000823-STRUB000886 STRUB000893-STRUB000894 STRUB000905-STRUB000910 STRUB000917-STRUB000919 TII00081355-81448
Rose Surgical Center	TII00047843-TII00047911

Bills:

Denver Digestive Health Specialists	STRUB000028-STRUB000033
Denver Endoscopy Center	STRUB000070
Kaiser Permanente	STRUB000121-STRUB000126 STRUB000887-STRUB000890 STRUB000895-STRUB000902 STRUB000911-STRUB000914
UC Health	STRUB000483-STRUB000490 STRUB000570-STRUB000576
St. Joseph Hospital	STRUB000751-STRUB000754
Physical Therapy Specialists	STRUB000891-STRUB000892 STRUB000903-STRUB000904 STRUB000915-STRUB000916
Rose Surgical Center	TII00047912

Health Department Records:

Colorado Department of Public Health & Environment	STRUB000006-STRUB000027
CDC FOIA Response	STRUB000808-STRUB000811

Proof of Purchase:

Amazon Receipt	STRUB000001-STRUB000004 STRUB000817-STRUB000822
1 st Bank Statements	STRUB000783-STRUB000792 STRUB000798-STRUB000807 STRUB000812-STRUB000816

Attachment B

The following is Defendant's Exhibit List, as incorporated here:

Description	ADMITTED IN EVIDENCE	OBJECTION FOUNDATION	OBJECTION OTHER
Food Safety Program TII000005879- TII000005921			
Food Safety Plan, Master Document List. TII000032090- TII000032094			
2020 Food Safety Policy Statement TII000032071- TII000032071			
2020 Food Safety Policy in Spanish. TII000032072- TII000032072			
GAP Food Safety Plan for TII TII000032073- TII000032077			
TII Org Chart, Ranch Safety Team TII000032078- TII000032078			
Food Safety Program, Part 1 TII000003617- TII000003645			
Food Safety Program, Part 2, North Facility TII000003553- TII000003569			
Glad2e product use log for Kern County. TII000003743- TII000003859			
Primus Labs Packaging Audit Checklist. TII000017511- TII000017520			
Jose Perez PSA Grower Training Course. TII000025666-TII000025666			
David Marquez PSA Grower Training Course, 2019			

1	TII000025667-TII000025667			
2	Nancy Anspach FSPCA			
3	Preventive Controls for Human			
4	Food, 02/08/2019.			
5	TII000025668-TII000025668			
6	Nancy Anspach PSA Grower			
7	Training Course.			
8	TII000025669-TII000025669			
9	Neftali Hernandez PSA Grower			
10	Training Course Certificate			
11	TII000025670-TII000025670			
12	Primus Final Audit Report for			
13	Brawley Onions located at			
14	Hilfiker Rd & Anderholt Rd &			
15	McCabe Rd, Brawley, CA			
16	TII000026686-TII000026708			
17	General Training SOP.			
18	TII000032080-TII000032082			
19	Food Defense Plan			
20	TII000032241- TII000032248			
21	R3 Food Defense Assessment.			
22	TII000032249-TII000032251			
23	Personal Food Training SOP			
24	TII000032257-TII000032261			
25	Food Safety Plan - Farming			
26	Operations. TII000032324-			
27	TII000032325			
28	2020 Food Safety Plan -			
	Farming Operations.			
	TII000032326-TII000032327			
	Micro Testing SOPs with			
	Michelson Lab Reports.			
	TII000033949-TII000033971			
	Authenticating Declaration for			
	Michelson Records			
	JJ Harvesting records for Angel			
	Nava. Includes Food Safety			
	Training certificates for Angel			
	Nava, Manuel Cano, Joel			
	Ocampo, Antonio Carranza,			
	Froylan Chiquito, and Teresa			
	Castillo.			
	TII000034392-TII000034447			
	JJ Harvesting records for Carlos			
	Mendoza, including food			
	safety, cleaning logs, SOPs,			

1	certificates. TII000034448-TII000034502			
2	JJ Harvesting records for			
3	Carmen Ramirez, restroom			
4	service logs, water report,			
5	permits, SOPs, certificates. TII000034503-TII000034553			
6	JJ Harvesting records for			
7	Catalna Avalos. SOPs, cleaning			
8	logs, training certification. TII000034554-TII000034770			
9	JJ Harvesting records for Ana			
10	Silva, SOPs, sanitation,			
11	temperature logs, certifications. TII000034771-TII000035417			
12	JJ Harvesting records for			
13	Angeles Pulido. SOPs,			
14	sanitation, certificates. TII000035418-TII000035567			
15	JJ Harvesting records for			
16	Carmen Ramirez. SOPs,			
17	sanitation, temperature logs. TII000035568-TII000035846			
18	JJ Harvesting records for Jackie			
19	Torres. SOPs, temperature logs,			
20	certifications. TII000035847-TII000036026			
21	J.J. Harvesting records for			
22	Leonel Gogo Lopez. SOPs,			
23	sanitization records,			
24	temperature logs, certificates. TII000036027-TII000036181			
25	JJ Harvesting Records for Raul			
26	Carranza. Food safety, SOPs,			
27	certificates. TII000036182-TII000036926			
28	JJ Harvesting records for			
	Guillermo Aleman. Food safety			
	training meeting, SOPs,			
	certificates. TII000036927-TII000036990			
	JJ Harvesting records for			
	Jaqueline Luna. Food safety,			
	cleaning, SOPs, certificates. TII000036991-TII000037042			
	JJ Harvesting records for Mario			
	Castillo. Food safety, SOPs,			

1	certificates. TII000037043-TII000037091			
2	JJ Harvesting records for Neri			
3	Herrera. Food safety, SOPs,			
4	certificates. TII000037092-TII000037182			
5	JJ Harvesting records for Raul			
6	Carranza. SOPs, food safety,			
7	certificates of completion. TII000037183-TII000037354			
8	IPC/Subway Request for			
9	Information TII00069899- TII00069904			
10	Master Sanitation SOP TII000003465-TII000003473			
11	Incoming Materials SOP TII000003474-TII000003476			
12	Chemical and Cleaning Inventory List TII000003507- TII000003515			
13	Product log with images of cleaning products used. TII000003516-TII000003518			
14	TII Cleaning Supplies Inventory from 08/16/2019. TII000003540- TII000003552			
15	Emergency Response SOPs. TII000003573-TII000003577			
16	Pre-Operation Inspection Log. TII000003578-TII000003584			
17	Daily cleaning logs for the onion lines from May 4, 2020, to July 31, 2020. TII000003585-TII000003601			
18	Weekly sanitation logs. TII000003602-TII000003611			
19	Floor drains cleaning and sanitation log beginning on May 8, 2020. TII000003612-TII000003616			
20	Pre-Operations log. TII000003646-TII000003699			
21	Table of contents to SOPs revised in 2019. TII000017566- TII000017598			
22	Harvest Container Cleaning/Sanitizing Log			

1	(Blank). TII000017727-			
2	TII000017727			
3	Cleaning/Sanitizing SOP			
4	TII000017728- TII000017730			
5	Flow chart for onion receiving,			
6	packing, shipping			
7	TII000018637-TII000018637			
8	Life cycle of onion shipping.			
9	TII000018894-TII0000189133			
10	Nancy Anspach FSPCA			
11	Preventive Controls for Human			
12	Food, 02/08/2019.			
13	TII000025668-TII000025668			
14	Garcia Diamond restroom			
15	service. TII000025694-			
16	TII000025712			
17	Risk Assessment Growing SOP			
18	TII000032067-TII000032070			
19	GAP Food Safety Plan			
20	TII000032073-TII000032077			
21	TII Org Chart			
22	TII000032079-TII000032079			
23	Management Review SOP			
24	TII000032083- TII000032085			
25	Industry Guidelines/Best			
26	Practices TII000032086-			
27	TII000032086			
28	TII Resource Analysis			
	TII000032087-TII000032087			
	Documentation & Record Keep			
	SOP TII000032088-			
	TII000032089			
	Master Document List, Module			
	2 TII000032095-TII000032095			
	SOP Table of Contents			
	TII000032096-TII000032127			
	How to Write a SOP			
	TII000032128-TII000032130			
	Corrective Action Procedure			
	SOP TII000032131-			
	TII000032133			
	Regulatory Inspections SOP			
	TII000032135-TII000032140			
	GAP Land History and Use and			
	Irrigation Water Checklist			
	TII000032141- TII000032143			

1	Growing Area Selection SOP TII000032144- TII000032149			
2	Grower Water Source			
3	Inspection SOP TII000032157- TII000032159			
4	Water Microbiological Testing SOP TII000032174- TII000032177			
5	Calibration SOP TII000032178-TII000032178			
6	Material On Hold and Rejected SOP TII000032180- TII000032182			
7	Product Release SOP TII000032183-TII000032184			
8	Buyer & Consumer Complaints & Feedback SOP TII000032185-TII000032188			
9	Farming Operation Approved Suppliers List TII000032189- TII000032189			
10	Supplier Approval & Monitoring SOP TII000032190-TII000032196			
11	Visitor/Contractor SOP TII000032253-TII000032255			
12	Personal Food Training SOP TII000032257-TII000032261			
13	Personal Food Training SOP TII000032275-TII000032280			
14	Disciplinary Action SOP TII000032281-TII000032283			
15	Return to Work SOP TII000032284-TII000032287			
16	Pesticide Management SOP TII000032295-TII000032298			
17	Chemical/Fertilizer/Pesticide Storage Inventory TII000032310-TII000032311			
18	Pesticide Storage Inventory SOP TII000032312- TII000032313			
19	Preventative Maintenance SOP TII000032314-TII000032316			
20	Work Order/Maintenance SOP TII000032317-TII000032319			
21				
22				
23				
24				
25				
26				
27				
28				

1	2020 TII Chemical List TII000032320-TII000032322			
2	Food Safety Plan - Farming Operations. TII000032324-			
3	TII000032325			
4	2020 Food Safety Plan - Farming Operations.			
5	TII000032326-TII000032327			
6	Micro Testing SOPs with Michelson Lab Reports.			
7	TII000033949-TII000033971			
8	2019 BC Labs and OxiDate Records. TII000033972-			
9	TII000034015			
10	Monitoring Logs Procedures TII000038008-TII000038025			
11	General Training SOP TII00063235-TII00063513			
12	Audit Meeting Logs TII000063515-TII000063539			
13	TII Board Conference Call, 01/22/2020 TII000037631-			
14	TII000037631			
15	TII Board Meeting Minutes, 03/27/2020 TII000037632-			
16	TII000037633			
17	KEI -BV Risk Assessment TII000032264-TII000032264			
18	KEI SKO Risk Assessment TII000032265-TII000032265			
19	RG 161 Risk Assessment. TII000032266-TII000032266			
20	RR Holtville Ash Risk Assessment. TII000032268-			
21	TII000032268			
22	Ranch 3 Risk Assessment TII000032269-TII000032269			
23	TII Glad Risk Assessment TII000032270-TII000032270			
24	Delis Water Source Risk Assessment. TII000032288-			
25	TII000032288			
26	KEI Field BV Canal Water Source Risk Assessment.			
27	TII000032291-TII000032291			
28	KEI Field SK Canal Water			

1	Source Risk Assessment. TII000032292-TII000032292			
2	TII Glad Water Source Risk			
3	Assessment. TII000032293- TII000032293			
4	TII R3 Water Source Risk			
5	Assessment TII000032294- TII000032294			
6	Ash 11 Pre-Harvest Risk			
7	Assessment. TII000032386- TII000032387			
8	BV-Sec 10 Preharvest Risk			
9	Assessment. TII000032388- TII000032389			
10	Fld 32 50 ac Preharvest Risk			
11	Assessment TII000032419- TII000032420			
12	Gladestone Pre-harvest Risk			
13	Assessment. TII000032423- TII000032424			
14	Pepper 22 Preharvest Risk			
15	Assessment. TII000032429- TII000032430			
16	RG-FLD 161 Pre-Harvest Risk			
17	Assessment TII000032432- TII000032433			
18	RG161 Preharvest Risk			
19	Assessment TII000032434- TII000032435			
20	Skone Preharvest Risk			
21	Assessment TII000032436- TII000032437			
22	Holtville Risk Assessments.			
23	TII000032588-TII000032588			
24	Email from Nicole Yuen stating			
25	that one of the samples			
26	collected does not match the			
27	outbreak strain. TII000025904- TII000025916			
28	Delis Water Source Risk			
	Assessment. TII000032288- TII000032288			
	Michelson Lab report number			
	072520-M627286A.			
	TII000002800-TII000002800			
	BC Laboratories, Inc., Water			
	Analysis (Bacteriological),			

1	dated 03/04/2019, for Well 1. TII000017599-TII000017601			
2	Water Test TII000017602-TII000017602			
3	FDA Receipt for fields and samples. TII000025797.000001- TII000025797.000002			
4	BC Labs water testing from 13 Palms. TII000032558- TII000032558			
5	BC Labs testing for Well #1. TII000032579-TII000032586			
6	BC Lab reports for bacteriological testing taken on April 10, 2020. TII000032590-TII000032596			
7	BC Labs testing for: Domestic, Packing Plant Well, Well, Well Discharge TII000033939-TII000033948			
8	Compilation of TII Onion Test Results			
9	Email between Nicole Yuen and Jack Thomson, indicating that TII onion samples from Bakersfield were all negative for Salmonella. Table of samples included earlier in thread. Some results still pending. TII000025764- TII000025768			
10	Email between Jack Thomson and Nicole Yuen, updating with further salmonella testing of TII samples: All negative. TII000025769-TII000025775			
11	FDA Receipt for fields and samples. TII000025797.000001- TII000025797.000002			
12	Email from Jack Thomson asking Nicole Yuen about sample results. TII000025830-TII000025837			
13	Email with lab results for some FDA samples. TII000025942-			

1	TII000025942			
2	Jack Thomson stated he			
3	received an additional negative			
4	sample notice from Jennifer			
5	Kinney. TII000025946-			
6	TII000025947			
7	Jack Thomson thanking Nicole			
8	Yuen for informing him of the			
9	CDC web post going live. Also			
10	updated sample list with some			
11	positive salmonella samples.			
12	TII000026054-TII000026067			
13	Email string with GPS			
14	coordinates of positive			
15	salmonella samples from TII.			
16	TII000026099-TII000026100			
17	Michelson Lab report 072520-			
18	M627284A, DATED			
19	07/25/2020.			
20	TII000027225-TII000027225			
21	FDA List of Sample test results.			
22	TII000003172-TII000003182			
23	Email from Donna William			
24	DXHill stating negative			
25	salmonella for 43/43			
26	subsamples.			
27	TII000020475-TII000020475			
28	Email from Nicole Yuen to			
	Jack Thomson with sample			
	updates.			
	TII000032643- TII000032650			
	Email string between Brandon			
	Adcock to Jeff Vidanes, dated			
	07/28/2020			
	PH PLAINTIFF 001223-PH			
	PLAINTIFF 001226			
	Memo from Daniel Gorski to			
	Brandi McGrady, dated			
	08/28/2020.			
	PH PLAINTIFF 001940-PH			
	PLAINTIFF 001966			
	Photographs of Holtville Drain			
	Ditch Sampling Site Exhibit 5			
	to Kramer Report			
	Authentication Declaration for			
	Photographs of Holtville Drain			

1	Ditch Sampling Site Exhibit 5 to Kramer Report			
2	Photographs from Prosser			
3	Washington Exhibit 7 to Kramer Report			
4	Authentication Declaration for			
5	Photographs from Prosser			
6	Washington Exhibit 7 to Kramer Report			
7	Email from Jeff Vidanes to			
8	Michael Needham, dated			
9	07/28/2020.			
10	Primus Standard Packinghouse			
11	Final Audit Report			
12	TII000017527-TII000017557			
13	Primus Audit Report for Ranch			
14	3, 2018. TII000018302-			
15	TII000018330			
16	Primus Audit Certificate for			
17	Ranch 3, June 1, 2018 to May			
18	31, 2019.			
19	TII000018331-TII000018332			
20	Primus audit for DiGiorgio Rd,			
21	Bakersfield. Audit on			
22	04/20/2020. Certification valid			
23	from May 13, 2020 to May 12,			
24	2021.			
25	TII000023393-TII000023412			
26	Primus certificate for Ranch 3			
27	at DiGiorgio Rd, valid from			
28	May 13, 2020 to May 12, 2021.			
	Final audit			
	score 97%.			
	TII000023413-TII000023414			
	Primus Standard Packinghouse			
	audit from August 28, 2019.			
	Score 94%.			
	TII000023446-TII000023447			
	Primus Final Audit Report for			
	Kei Filed Skone, located in			
	Tejon Rd, Bakersfield, dated			
	April 20, 2020.			
	TII000023460-TII000023477			
	Primus Corrective Action			
	Report for Kei Field Skone,			
	dated April 20, 2020.			
	TII000023478-TII000023482			

1	Primus Certificate for Kei Field			
2	Skone, Tejon Road, dated from			
3	May 28, 2020 to May 27, 2021.			
4	Audit score 97%. TII000023483-TII000023484			
5	Primus audit "Corrective			
6	Action Report" for Kei Field			
7	BV, located at Buena Vista			
8	Blvd, Bakersfield, dated April			
9	20, 2020. TII000023486-TII000023490			
10	Primus Final Audit Report for			
11	Kei Field BV dated April 20,			
12	2020. TII000023491-TII000023509			
13	Primus Certificate for Kei Field			
14	BV from May 28, 2020 to May			
15	27, 2021. TII000023510-TII000023511			
16	Primus Final Audit Report for			
17	Brawley Onions located at			
18	Hilfiker Rd & Anderholt Rd &			
19	McCabe Rd, Brawley, CA TII000026686-TII000026708			
20	Primus Certificate for Brawley			
21	Onions valid from May 15,			
22	2019 to May 14, 2020. Audit			
23	score of 95%. TII000026709-			
24	TII000026710			
25	Primus Certificate for			
26	Evergrow, Hageman & Wegis			
27	Bakersfield, CA for May 28,			
28	2019 to May 27, 2020. TII000026733-TII000026734			
	Primus Certificate for			
	Kirschenmann, Bakersfield,			
	CA, from May 28, 2019 to May			
	27, 2020. TII000026795-TII000026796			
	Primus Certificate for Ranch 3,			
	Bakersfield, CA, from May 28,			
	2019 to May 27, 2020. TII000026837-TII000026838			
	Primus audit report for Highline			
	Cooling LLC located in			
	Holtville, CA on January 8,			

1	2020. TII000027060- TII000027091			
2	Sales Transactions for Holtville			
3	Primus corrective action report for Highline Cooling LLC. TII000027092-TII000027099			
4	Primus Certificate for Highline Cooling LLC. TII000027100- TII000027101			
5	2020 Primus GFS Gladstone Certificate. TII000032023- TII000032024			
6	Sales Transactions for Gladstone			
7	Primus KEI Field Skone Certificate, 05/28/2020 to 05/27/2021. TII000032056-TII000032057			
8	Ash 11 Primus Report. TII000034351-TII000034371			
9	Primus Audit binder. TII000037978-TII000038000			
10	Authenticating Declarations for Primus Records			
11	2020 lot chart. TII000017723-TII000017723			
12	GPS Field Locations TII000019908-TII000019923			
13	Ranch 3 Site Map. TII000032256-TII000032256			
14	Ranch 3 Map TII000032262-TII000032262			
15	Ranch 3 Operations Map TII000032263-TII000032263			
16	Field crop history. TII000032323-TII000032323			
17	2023.05.05 Medical - Oregon Health Authority M. Peterson TII000046073-TII000046101			
18	2023.05.05 Plaintiffs' Supplemental Production - CA DPH Report NLOPLAINTIFFS00454- NLOPLAINTIFFS00460			
19	2023.05.05 Plaintiffs' Supplemental Production -			

1	Canadian Recall List			
2	NLOPLAINTIFFS00418-			
3	NLOPLAINTIFFS00438			
4	2023.05.05 Plaintiffs'			
5	Supplemental Production -			
6	FDA Report			
7	NLOPLAINTIFFS00439-			
8	NLOPLAINTIFFS00453			
9	2023.05.05 Plaintiffs'			
10	Supplemental Production -			
11	NLOPLAINTIFFS00461-			
12	NLOPLAINTIFFS00626			
13	2023.07.18 Medical -			
14	Washington State Department			
15	of Health PETERSON			
16	TII00049014-TII000051026			
17	2023.12.20 Medical M.			
18	Peterson - CDC TII00067213			
19	2023.03.30 Medical - Denver			
20	Endoscopy Center STRUB			
21	TII000042542			
22	2023.03.30 Medical - Denver			
23	Endoscopy Center STRUB			
24	TII000042543			
25	2023.03.30 Medical - Denver			
26	Gisestive Health Specialist			
27	STRUB TII000042453			
28	2023.03.30 Medical - Kaiser			
	Colorado STRUB			
	TII000042642			
	2023.03.30 Medical - Kaiser			
	STRUB TII000042609			
	2023.03.30 Medical - Kaiser			
	STRUB TII000043126			
	2023.03.30 Medical - UCHealth			
	STRUB TII000043147			
	2023.03.30 Medical - UCHelath			
	STRUB TII000043146			
	2023.05.05 Medical - Colorado			
	Department of Public Health			
	and Environment STRUB			
	TII000045768			
	2023.05.05 Plaintiffs'			
	Supplemental Production-CA			
	DPH Report 454-460			
	2023.05.05 Plaintiffs'			
	Supplemental Production-			

1	Canadian Recall List 418-438			
2	2023.05.05 Plaintiffs'			
3	Supplemental Production-FDA			
4	Report 439-453			
5	2023.05.05 Plaintiffs'			
6	Supplemental Production-			
7	NLOPLAINTIFFS00461-			
8	NLOPLAINTIFFS00626			
9	2023.07.18 Billing - Rose			
10	Surgery Center STRUB			
11	TII00047912			
12	2023.07.18 Medical - CORE			
13	STRUB TII00047677			
14	2023.07.18 Medical - Rose			
15	Surgery Center STRUB			
16	TII00047843			
17	2023.07.18 Medical - Saint			
18	Joseph Hospital STRUB			
19	TII00047913			
20	2024.01.05 SUPL Production -			
21	STRUB000808			
22	2024.01.05 SUPL Production -			
23	STRUB809 - 23-			
24	01049 LineList			
25	2024.01.05 SUPL Production -			
26	STRUB810 - 23-			
27	01049 NARMS-Database			
28	2024.01.05 SUPL Production -			
	STRUB811 -			
	foia23_01049_linelist_highlight			
	s			
	2024.02.19 SUPPLEMENTAL			
	PRODUCTION			
	STRUB000826-STRUB000919			
	Plaintiff Strub's Sallmonella			
	isolate family tree			
	2020 Salmonella Newport			
	isolate family tree			
	2023.03.30 Medical - Dr. Paul			
	Podett Mountain View Family			
	Prac- BARRY TII000043159			
	2023.03.30 Medical - GoHealth			
	BARRY TII000043506			
	2023.03.30 Medical - Legacy			
	MT Hood Medical Center			
	BARRY TII000043584			

1	2023.03.30 Medical - Legacy			
2	MT Hood Medical Center			
3	BARRY TII000043588			
4	2023.07.18 Medical - Center			
5	for Mens and Womens Urology			
6	BARRY TII00047465			
7	Northwest Acute Care			
8	Specialists PC-Statement			
9	BARRY000621			
10	2022.12.20 Medical Lori			
11	Davies - Northwest			
12	Rheumatology Assoc.			
13	TII00067231			
14	2023.03.30 Medical -			
15	Northwest Surgical Specialist			
16	PC DAVIES TII000045016			
17	2023.03.30 Medical -			
18	Providence Health Services			
19	DAVIES TII000044965			
20	2023.03.30 Medical -			
21	Providence St Vincent Medical			
22	Center DAVIES TII000043640			
23	2023.03.30 Medical - Rebound			
24	DAVIES TII000045027			
25	2023.03.30 Medical - TRG			
26	LLC DAVIES TII000045480			
27	2023.05.05 Medical - NW			
28	Dermatology Institute DAVIES			
	TII000046001			
	2023.05.05 Medical - Oregon			
	Health Authority DAVIES			
	TII000046054			
	2023.05.05 Medical -			
	Washington County Health and			
	Human Services Department			
	DAVIES TII000046102			
	2023.07.18 Medical - Allergy			
	Asthma and Dermatology			
	Assoc DAVIES TII00047439			
	2023.12.20 Medical Lori			
	Davies - Biolounge Nutrition			
	TII00067223			
	2023.12.20 Medical Lori			
	Davies - CDC TII00067158			
	2024.01.08 Medical Lori			
	Davies - The Oregon Clinic			
	Center for Adv Surgery			

1	TII000067277-TII000067295			
2	2024.01.31 Medical-Billing			
3	Phoebe Rich Dermatology - L.			
4	Davies TII00067480			
5	2024.02.10 Billing - Northwest			
6	Rheumatolog Ass. L. Davies-			
7	TII000067762			
8	2024.02.13 Medical-Billing			
9	Inner Gate Health and Wellness			
10	CA1153452004v0 L. Davies-			
11	TII000067763			
12	2024.02.14 Medical-Billing			
13	Restore Hyper Wellness			
14	CA1153452001v0 L. Davies-			
15	TII000067776			
16	2024.02.19 Medical-Billing			
17	Oregon Clinic Providence			
18	Portland TII000067815			
19	2024.02.23 Medical-Billing			
20	Julie Decker Lymphatics			
21	CA1153452003v0 TII00068789			
22	2024.02.26 Medical-Billing			
23	Northwest Woman's Clinic			
24	CA1153931001v0 L. Davies			
25	TII00068811			
26	2023.10.25 Medical - Alberta			
27	Health Services KLAM			
28	TII000063548			
	2023.10.25 Medical - Dr. Gaunt			
	KLAM TII000063602			
	2023.10.25 Medical - Public			
	Health Agency of Canada			
	KLAM TII000063558.pdf			
	2023.12.20 Medical Lynnetta			
	Klam - Dennis N. Todoruk			
	TII00067214			
	2023.12.20 Medical Lynnetta			
	Klam - Dr. John Ellis			
	TII00067159 PRODUCED			
	2022.12.01 Plaintiff's			
	Production - FLODING00001			
	LineListofMTCases			
	FlodingCaseHighlighted			
	(1063837.1)			
	2022.12.01 Plaintiff's			
	Production - FLODING00002			

1	Video from ER(1063838.1)			
2	2023.05.05 Billing - Dr. John			
3	Bohler FLODING			
4	TII000045981			
5	2023.05.05 Billing - St. Peter's			
6	Hospital FLODING			
7	TII000046197			
8	2023.05.05 Medical - St. Peter's			
9	Hospital FLODING			
10	TII000046132			
11	2023.05.05 Medical - St. Peter's			
12	Hospital FLODING			
13	TII000046225			
14	2023.07.08 Medical - Monta			
15	Dept of PHHS FLODING			
16	TII00047030			
17	2023.07.18 Medical - FDA			
18	FLODING TII00047273			
19	2023.07.18 Medical -			
20	FLODING TII00047181			
21	2023.07.18 Medical - Jefferson			
22	County Health Dept FLODING			
23	TII00047207			
24	2023.10.25 Medical - Benefis			
25	Hospital Physician Services			
26	BENSON TII000063754			
27	2023.10.25 Medical - Great			
28	Falls Clinic BENSON			
	TII000063846			
	2023.10.25 Medical - Great			
	Falls Clinic Lab Report			
	BENSON TII000063657			
	2023.10.25 Medical - Indian			
	Family Health Clinic BENSON			
	TII000063667			
	2023.10.25 Medical - Indian			
	Family Health Clinic BENSON			
	TII000063828			
	2020.07.21. Email from Jeff			
	Vidanes to Michael Needham			
	2020.07.27. Email from Violet			
	Lombard TII00075821 to			
	TII00075826			
	2020.07.28. Email from Jeff			
	Vidanes to CDPH			
	TII000077607			

1	2020.07.28. Email string with redactions from Jeff Vidanes			
2	2020.07.29. Email from Brandon Adcock to Christian Bond			
3	30b6CaliforniaCDPH-BrandonAdcock-PMK_12			
4				
5	2020.07.29. Email from Lauren Edwards to Lisa Joseph and Lisa Hainstock, and CC to April Hunt and Jayne Holcomb, Subject "RE Uptick in Salmonella Cases," TII00075858- TII00075864			
6				
7	2020.07.29. Email from Lisa Joseph TII00075610 to TII00075620			
8				
9	2020.07.29. Email from Lauren Edwards TII00076029 to TII00076036			
10				
11	2020.07.29. Email from Lauren Edwards to Lisa Hainstock TII00075936 to TII00075943			
12				
13	2020.07.29. Email from Lisa Joseph to Lauren Edwards; Lisa Hainstock TII00075878 to TII00075887			
14				
15	2020.07.29. Email from Lisa Joseph to Lisa Hainstock and Lauren Edwards TII00075621 to TII00075631			
16				
17	2020.07.29. Email from Lisa Joseph to Lisa Hainstock and Lauren Edwards TII00075632 to TII00075641			
18				
19	2020.07.29. Email from Lisa Hainstock to Lauren Edwards TII00075898 to TII00075902			
20				
21	2020.07.29. Email from Lisa Joseph to Lauren Edwards and Lisa Hainstock TII00075667 to TII00075681			
22				
23	2020.07.29. Email String from Lisa Joseph to MDARD TII00075610 to TII00075617			
24				
25	2020.07.30. Email from Michael Needham to CDPH			
26				
27				
28				

1	2020.07.30. Public Health			
2	Notice: Outbreak of Salmonella			
3	infections linked to red onions			
4	imported from the United States			
5	TII00002941-2949			
6	2020.07.31. Email from Jeffrey			
7	Higa to CDPH			
8	2020.07.31. Email from Jeff			
9	Vidanes, To Michael Needham,			
10	with CC to Brandon Adcock			
11	and Christian Bond			
12	30b6CaliforniaCDPH-			
13	BrandonAdcock-PMK 13			
14	2020.07.31. Email from			
15	Michael Needham to Jane			
16	Reick, CC to Jeff Vidanes and			
17	Brandon Adcock			
18	30b6CaliforniaCDPH-			
19	BrandonAdcock-PMK 14			
20	2020.07.31 Email string from			
21	Benson Yee to CDPH			
22	2020.07.31. CDC Talking			
23	Points TII000056867			
24	2020.07.31. Meeting Invite			
25	from Mark Otto TII00075561			
26	to TII00075563			
27	2020.07.31. Email from			
28	Danielle Donovan TII00076077			
	to TII00076080			
	2020.08.05. Email from Lisa			
	Joseph to Lisa Hainstock and			
	Jayne Holcomb			
	2020.08.05. Email from Lisa			
	Joseph to Lisa Hainstock			
	TII00075608 to TII00075609			
	2020.08.06. Email from Trevor			
	Flint to Redacted Name.			
	30b6CaliforniaCDPH-			
	BrandonAdcock-PMK 10			
	2020.08.11. Email from Lisa			
	Joseph to Lisa Hainstock			
	TII00075599 to TII00075601			
	2020.08.17. Katherine Arends			
	to Lauren Edwards amd Sally			
	Bidol TII00075760 to			
	TII00075767			

1	2020.08.17. Email from Sally Bidol TII00075752 to TII00075759			
2				
3	2020.08.20 Email from Redacted name to FDB-ERU (CDPH-FDB)			
4	30b6CaliforniaCDPH-			
5	BrandonAdcock-PMK 9			
6	2020.09.08. Email from Michael Needham to Jane Reick			
7	30b6CaliforniaCDPH-			
8	BrandonAdcock-PMK 15			
9	Invest20009_Timeline_090920			
10	30b6CaliforniaCDPH-			
11	BrandonAdcock-PMK 4			
12	Invest20009_Timeline_090920			
13	30b6CaliforniaCDPH-			
14	BrandonAdcock-PMK 5			
15	Invest20009_Timeline_090920			
16	30b6CaliforniaCDPH-			
17	BrandonAdcock-PMK 6			
18	2020.09.11. Meeting Invite organized by Stranjae Ivory			
19	TII00075566 to TII00075569			
20	2020.11.03. CORE Network Salmonella Incident Report and related documents-			
21	TII000061568 to TII00061733			
22	Investigation Report			
23	30b6CaliforniaCDPH-			
24	BrandonAdcock-PMK 1			
25	California's Traceback Investigation			
26	30b6CaliforniaCDPH-			
27	BrandonAdcock-PMK 8			
28	Multistate Outbreak of Salmonella Newport Infections Linked to Onions, The California Investigation			
	30b6CaliforniaCDPH-			
	BrandonAdcock-PMK 11			
	Laboratory Reports			
	TII00050247-50279,			
	TII00050335, TII00050354			
	Expert Report of Dr. Melvin N. Kramer Daniel Coto Stephen			

1	Blackwell and Supporting Exhibits			
2	Expert Report of Dr. Martin Wiedmann and Supporting Exhibits			
3	Expert Report of Dr. Jonathan C. Ellis and Supporting Exhibits			
4	Expert Report of Dr. Daniel J. Wallace and Supporting Exhibits			
5	Salmonella Newport 2007MLJJP-1 – Cilantro, Tomato, or Onion Suspect Product Flow Diagram DRAFT TII00069358-9f			
6	FDA documents obtained through FOIA			
7	Salmonella Newport/Red onion/Jul 2020 Traceback Investigation Summary			
8	Traceback diagram annotated by Marler firm			
9	Food Safety Investigation			
10	Multiprovincial cluster of Salmonella Newport in BC, AB, SK, MB, ON, QC, and PE			
11	2007NewWGS1MP Final Investigation Summary, November 2020			
12	Collection of Canadian records produced by Thomson, TII00068082 et seq.			
13	Multistate Outbreak of Salmonella Newport Associated with Onions – June to September 2020 Final Report September 2021			
14	Collection of 458 pages of Montana public health records produced by plaintiff Floding.			
15	Salmonella Newport and Onions (2007MLJJP-1) Outbreak Investigation Report, January 2021			
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				

1	McCormic et al, Bi-national outbreak of Salmonella			
2	Newport infections linked to			
3	onions: the United States experience			
4	Alberta Health Services report July 20, 2020			
5	2020EI2986: MultiZone Salmonella outbreak in Alberta			
6	August 4, 2020			
7	2020EI2986: MultiZone Salmonella outbreak in Alberta			
8	August 5, 2020			
9	Alberta Health Services report July 20, 2020			
10	#2021-G-024 Food testing records			
11	2020EI2986: MultiZone Salmonella outbreak in Alberta			
12	July 24, 2020			
13	2020EI2986: MultiZone Salmonella outbreak in Alberta			
14	July 28, 2020			
15	Alberta Health Services report July 28, 2020			
16	#2021-G-024 July 28, 2020			
17	2020EI2986: MultiZone Salmonella outbreak in Alberta			
18	July 29, 2020			
19	2020EI2986: MultiZone Salmonella outbreak in Alberta			
20	July 30, 2020			
21	2020EI2986: MultiZone Salmonella outbreak in Alberta			
22	July 31, 2020			
23	Final Investigation Summary, November 2020			
24	2020EI2986: MultiZone Salmonella outbreak in Alberta			
25	July 20, 2020			
26	2020EI2986: MultiZone Salmonella outbreak in Alberta			
27	Sept 9, 2020			
28	Alberta Health Services report July 22, 2020			

1	Email Havens to Evangeline August 3, 2020			
2	Email Evanson to Havens August 3, 2020			
3	Email Evanson to Havens August 3, 2020			
4	Email Havens to Volkman August 4, 2020			
5	Email Havens to Volkman August 4, 2020			
6	Email Ebelt to Hinnenkamp August 5, 2020			
7	Email Havens to Volkman July 22, 2020			
8	Email Havens to Volkman July 23, 2020			
9	Email Havens to Volkman July 23, 2020			
10	Email Havens to Volkman July 23, 2020			
11	Email Weisner to Hinnenkamp July 24, 2020			
12	Email Havens to Volkman July 24, 2020			
13	Email Havens to Volkman July 24, 2020			
14	Email Havens to Pearson July 28, 2020			
15	Email Havens to Volkman July 28, 2020			
16	Email Havens to Pearson July 28, 2020			
17	Email Havens to Volkman July 29, 2020			
18	Email Havens to Pearson July 29, 2020			
19	Email Havens to Hinnenkamp July 29, 2020			
20	Email Havens to Ftalbot July 29, 2020			
21	Email Taylor to Boyd October 2, 2020			
22	Alberta Health email October 19, 2020			
23	Email Pereira to Otto August 1, 2020			
24	Summary of S. Newport event — prepared for industry partner teleconferences July 31, 2020			
25				
26				
27				
28				

1	Email Leftwich to Marcynuk July 30, 2020			
2	Email Cheng to many July 30, 2020			
3	July 30, 2020 Media Lines			
4				
5	Email Nadon to Christianson July 29, 2020			
6	Hexemer to Alberta Health July 28, 2020			
7	Email Christianson to Trout July 22, 2020			
8	Haywood to Honish July 27, 2020			
9	Salmonella Newport — 2007NewWGS-1MP investigation Epidemiologic Summary- July 27, 2020			
10	Isaac to Enteric outbreak July 27, 2020			
11	Mah to Hexemer July 28, 2020			
12				
13	Epid to Haywood July 27, 2020			
14				
15	Hexemer to Haywood July 25, 2020			
16	Cheng to AHEZ July 25, 2020			
17				
18	Email Nichani to Nadon July 24, 2020			
19	Email Nichani to Nadon July 24, 2020			
20	Email Boyd to Enteric Outbreak July 24, 2020			
21	Haywood to OFSR July 23, 2020			
22				
23	Email Taylor to Hexemer July 23, 2020			
24	Email Chui to Kearney July 22, 2020			
25	Email Christianson to Trout July 22, 2020			
26	Email Honish to Enteric Outbreak July 23, 2020			
27	July 17, 2020-EI-2986: Multi- Zone Salmonella outbreak in Alberta, senior's care facilities			
28				

1	Salmonella Newport —			
2	2007NewWGS-1MP			
3	investigation			
4	Epidemiologic Summary- July			
5	29, 2020			
6	Salmonella Newport —			
7	2007NewWGS-1MP			
8	investigation			
9	Epidemiologic Summary-			
10	August 19, 2020			
11	Cheng to Honish August 12,			
12	2020			
13	Dumoulin to Hexemer August			
14	4, 2020			
15	Cheng to Dumoulin August 4,			
16	2020			
17	Cheng to Hexemer August 1,			
18	2020			
19	Todd to Martinez July 29, 2020			
20	McCormic to Hinnenkemp			
21	August 10, 2020			
22	FDA traceback summary			
23	Salmonella Newport/Red			
24	onion/Jul2020			
25	FDA FOIA response			
26	Email exchange covering FDA			
27	FOIA response			
28	PETERSON PH Records			
	FLODING MT PH Records			
	459 – 482			
	DAVIES public health Records			
	BC traceback diagram			
	Kramer demonstrative			
	“Traditional Foodborne			
	Outbreak Investigation			
	Diagram”			
	Kramer demonstrative			
	“Investigation Results			
	Diagram”			
	July 13 distribution timeline			

1	July 28, 2020 email Adcock to Vidanes TII00071288			
2	August 12, 2020 email Sloan to FDB-ERU TII00071177 -80			
3	August 4, 2020 email Adcock to Yuen TII00071260			
4	July 30, 2020 email Adcock to Bond TII00071276			
5	July 24, 2020 email Higa to Needham TII00071554 -7			
6	September 14, 2020 Vidanes to: Bond TII00071277			
7	July 30, 2020 email Yee to Needham TII00071571 - 2			
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				